

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ALEXANDRE PELLETIER, Individually and) Civ. Action No. 2:17-cv-05114-MMB
on Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.) Honorable Michael M. Baylson
ENDO INTERNATIONAL PLC, et al.,) **DECLARATION OF JOSEPH A. FONTI
IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND
EXPENSES**
Defendants.)

I, Joseph A. Fonti, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a founding partner of the law firm Bleichmar Fonti & Auld LLP (“BFA” or “Prior Lead Counsel”).¹ I submit this declaration in support of an award of attorneys’ fees and expenses/charges (“expenses”) in connection with the services rendered in the above-entitled action (the “Action”).
2. This declaration addresses the time and expenses incurred by all counsel representing Prior Lead Plaintiff Park Employees’ and Retirement Board Employees’ Annuity and Benefit Fund of Chicago (“Chicago Park”), namely BFA; Elliott Greenleaf, P.C.; Hangley Aronchick Segal Pudlin & Schiller; the Law Offices of Susan R. Podolsky; Kehoe Law Firm, P.C.; and Jacobs Burns Orlove & Hernandez LLP (collectively “Prior Lead Plaintiff’s Counsel”). I have personal knowledge of the information in this declaration. BFA’s time and expenses are taken from time and expense reports and supporting documentation prepared and maintained by BFA in the ordinary course of business. The information regarding time and expenses of other Prior Lead Plaintiff’s Counsel is taken from time and expense reports and supporting documentation provided from those firms to BFA.
3. I am the lead partner who oversaw and conducted the day-to-day activities in the litigation as Prior Lead Counsel, and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. For instance, Prior Lead Plaintiff’s Counsel’s submission does not include the time of individuals that billed less

¹ All capitalized terms not defined herein have the meanings stated in the Stipulation of Settlement (ECF 396-1).

than 30 hours to this matter or the time expended in preparing the application for fees and expenses. Further, expenses related to transportation, hotels, and meals were capped subject to Prior Lead Counsel's policies described in Paragraph 8(d).

4. In consultation with Lead Counsel and Co-Lead Counsel, Prior Lead Plaintiff's Counsel excludes and does not submit lodestar for work that was specific to Chicago Park in its role as Prior Lead Plaintiff and proposed class representative; the objection and appeals related to the Pennsylvania state court action captioned *Pub. Emps. 'Ret. of Miss. v. Endo Int'l plc*; and all work performed before June 19, 2018 (the day Chicago Park was appointed as Lead Plaintiff (ECF 59)) and after December 9, 2020 (the date on which the Court held its first hearing on Chicago Park's motion for class certification).

5. Prior to making the reductions described in Paragraph 4, the total number of hours spent on the litigation by Prior Lead Plaintiff's Counsel is 23,804.75 and the total lodestar amount is \$14,081,021. The reductions described in Paragraph 4 amount to the removal of 5,158.25 hours, or \$3,574,681 of lodestar. After these reductions, the number of hours spent on the litigation by Prior Lead Plaintiff's Counsel is 18,646.50 and the net lodestar amount is \$10,506,340. The lodestar amount for attorney and professional support staff time is calculated using Prior Lead Plaintiff's Counsel's 2021 rates. These rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. For personnel who are no longer employed by Prior Lead Plaintiff's Counsel, the rate used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the firm. A breakdown of the lodestar is provided in Exhibit A.

6. Elliott Greenleaf P.C. billed its time on a non-contingent basis. These fees are therefore treated as an expense for purposes of this submission, as set forth in Paragraph 8(c) below, and are not included in Prior Lead Plaintiff's Counsel's lodestar. Jacobs Burns Orlove &

Hernandez LLP also billed its time on a non-contingent basis; its fees and associated expenses are excluded from this submission for the reasons set forth in Paragraph 4, and are also not included in Prior Lead Plaintiff's Counsel's lodestar.

7. Prior Lead Plaintiff's Counsel incurred expenses and charges of \$1,510,360 in connection with the prosecution of the litigation. Expenses in the amount of \$219,087 have been removed as associated with the work described in Paragraph 4 above. Accordingly, Prior Lead Plaintiff's Counsel seek payment of expenses in the amount of \$1,291,273, as summarized by category in Exhibit B.

8. The following is additional information regarding certain of these expenses:

(a) Filing, Witness and Other Fees: \$2,362. These expenses have been incurred for Court filing fees and for attorney service firms or individuals who either (i) served process of the complaint or subpoenas, or (ii) obtained copies of court documents. The vendors for these services are set forth in Exhibit C.

(b) Outside Counsel For Witnesses: \$9,025. In connection with the prosecution of this case, BFA incurred attorneys' fees from Giskan Solotaroff & Anderson LLP, as counsel for third-party witnesses.

(c) Prior Lead Plaintiff's Counsel Attorneys' Non-Contingent Fees: \$68,266. In connection with the prosecution of this case, Elliott Greenleaf P.C. has incurred non-contingent fees of \$68,266.

(d) Transportation, Hotels & Meals: \$28,331. In connection with the prosecution of this case, Prior Lead Plaintiff's Counsel has incurred travel expenses to, among other things, attend court hearings, meet with witnesses, mediators and opposing counsel and take and defend depositions. The date, destination and purpose of each trip is set forth in Exhibit D. Additionally, we reduced all out-of-town transportation to the relevant coach rates and reduced all

hotel expenses to a maximum of \$300 per night for large cities and \$250 per night for smaller cities. Meals during business travel, while working on weekends and holidays, and work-week dinners when working in the office past 8:00 pm were capped in total at \$45 per person; lunch was capped in total at \$20 per person; and all other food and drink was capped in total at \$15 per person.

(e) Court Hearing Transcripts and Deposition Reporting, Transcripts and Videography: \$52,744. The vendors for hearing and deposition transcripts are listed in Exhibit E.

(f) Experts/Consultants/Investigators: \$827,599, as set forth in Exhibit B.

(i) Stanford Consulting Group, Inc., which provided expert services concerning market efficiency and class certification.

(ii) Global Economics Group, LLC, which provided consulting advice concerning damages at the outset of the litigation.

(iii) FIDERES Partners LLP, which provided consulting advice concerning generic drug pricing, profits, and competition.

(iv) Compass Lexecon LLC, which provided consulting advice concerning damages in connection with mediation.

(v) Gryphon Strategies, which provided investigative services.

(vi) Hemming Morse LLP, which provided consulting advice concerning forensic accounting, disclosure, and internal controls issues.

(vii) JFM Litigation Consulting, LLC, which provided consulting advice concerning Endo's financial condition.

(g) Photocopies: \$591. Prior Lead Plaintiff's Counsel also incurred \$591 in expenses for photocopies. A breakdown of these charges by date and vendor is set forth in Exhibit F.

(h) Messenger Services and Overnight Delivery: \$5,629. Prior Lead Plaintiff's Counsel also incurred expense of \$5,629 from outside vendors for messenger and overnight delivery, as set forth in Exhibit B.

(i) Postage: \$33. Prior Lead Plaintiff's Counsel also incurred expenses of \$33 for postage, as set forth in Exhibit B.

(j) Online Legal Research: \$4,574. This category includes vendors such as PACER and Thomson Reuters. These resources were used to obtain access to legal research, factual databases, and for cite-checking of briefs. This expense represents the expense incurred by Prior Lead Plaintiff's Counsel for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested. For example, BFA has flat-rate contracts with some of these providers for use of their services. When BFA utilizes online services provided by a vendor with a flat-rate contract, access to the service is by a billing code entered for the specific case being litigated. At the end of each billing period in which such service is used, BFA's costs for such services are allocated to specific cases based on the percentage of use in connection with that specific case in the billing period.

(k) Document Hosting: \$266,114. BFA also incurred \$266,114 to outside vendors to electronically host Defendants' and third parties' document productions in this action for attorney review, access, and search.

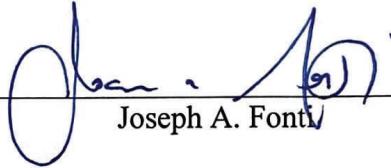
(l) Mediation Fees: \$26,005. BFA incurred fees for the services of Phillips ADR Enterprises, P.C., which conducted in-person and telephonic/video mediation sessions.

9. Based on this review and the adjustments made, I believe that the time reflected in Prior Lead Plaintiff's Counsel's lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation.

10. Prior Lead Plaintiff's Counsel's expenses pertaining to this case are reflected in the books and records of each firm. BFA's books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses incurred. Based on my discussions with other Prior Lead Plaintiff's Counsel, the books and records of those firms are also prepared from receipts, expense vouchers, check records and other documents and are accurate records of the expenses incurred.

11. The background for BFA is attached hereto as Exhibit G.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of January 2022, at Westchester, New York.



Joseph A. Fonti

EXHIBIT A

EXHIBIT A

Pelletier v. Endo International PLC, et al., No. 2:17-cv-05114-MMB
 Bleichmar Fonti & Auld LLP
 June 19, 2018 through December 9, 2020

NAME		HOURS	RATE	LODESTAR
Bleichmar, Javier	(P)	259.00	\$985	\$255,115
Fonti, Joseph A.	(P)	1,954.00	\$985	\$1,924,690
Meeks, Wilson M. III	(P)	711.00	\$740	\$526,140
Schramm, Kendra	(OC)	33.50	\$780	\$26,130
Simnowitz, Sara Pildis	(SC)	89.75	\$780	\$70,005
Burry, Benjamin F.	(A)	944.25	\$655	\$618,484
Dennany, Nicholas	(A)	47.25	\$560	\$26,460
Geraci, William	(A)	509.50	\$510	\$259,845
Green, F. William	(A)	1,191.75	\$495	\$589,916
Hough, Mathew	(A)	967.75	\$605	\$585,489
Kubota, Evan A.	(A)	958.00	\$690	\$661,020
Nachmani, Jake	(A)	540.00	\$560	\$302,400
Stoddard, Thayne	(A)	1,021.75	\$655	\$669,246
Williams, Franklyn	(SP)	1,584.25	\$495	\$784,204
Jurmark, Jennifer	(ED)	343.00	\$395	\$135,485
Coleman, Timothy	(SA)	1,184.00	\$390	\$461,760
Erickson, Karyn	(SA)	278.00	\$395	\$109,810
Leslie, Fredric	(SA)	818.00	\$390	\$319,020
Manrose, Scott	(SA)	558.25	\$360	\$200,970
Markham, Cynthia	(SA)	1,349.75	\$360	\$485,910
Messing, Craig	(SA)	587.25	\$360	\$211,410
Rosenberg, Justin	(SA)	1,268.25	\$390	\$494,618
Feliz, Masiel	(PL)	356.75	\$350	\$124,863
Russo, Michael	(PL)	225.00	\$445	\$100,125
TOTAL		17,780.00		\$9,943,115

(P) Partner

(OC) Of Counsel

(SC) Special Counsel

(A) Associate

(SP) Senior Projects Associate

(ED) eDiscovery Manager

(SA) Staff Attorney

(PL) Paralegal

The Law Offices of Susan R. Podolsky
June 19, 2018 through December 9, 2020

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Podolsky, Susan R.	(P)	866.5	\$650	\$563,225
<i>TOTAL</i>				\$563,225

(P) Partner

EXHIBIT B

EXHIBIT B

Pelletier v. Endo International PLC, et al., No. 2:17-cv-05114-MMB
 Prior Lead Plaintiff's Counsel
 June 19, 2018 through Present

CATEGORY	AMOUNT
Filing, Witness and Other Fees	\$2,362
Outside Counsel for Witnesses	\$9,025
Prior Lead Plaintiff's Counsel's Attorneys' Non-Contingent Fees – Elliott Greenleaf P.C.	\$68,266
Transportation, Hotels & Meals	\$28,331
Court Hearing Transcripts and Deposition Reporting, Transcripts and Videography	\$52,744
Experts/Consultants/Investigators	\$827,599
Stanford Consulting Group, Inc.	\$411,846
Global Economics Group, LLC	\$22,148
FIDERES Partners LLP	\$82,975
Compass Lexecon LLC	\$178,058
Gryphon Strategies	\$57,246
Hemming Morse LLP	\$47,782
JFM Litigation Consulting, LLC	\$27,544
Photocopies	\$591
Outside	\$266
In-House at Elliott Greenleaf P.C.	\$325
Messenger, Overnight Delivery	\$5,629
Postage	\$33
Online Legal and Financial Research	\$4,574
Document Hosting	\$266,114
Mediation Fees (Phillips ADR Enterprises, P.C.)	\$26,005
TOTAL	\$1,291,273

EXHIBIT C

EXHIBIT C

Pelletier v. Endo International PLC, et al., No. 2:17-cv-05114-MMB
 Prior Lead Plaintiff's Counsel
 June 19, 2018 through December 9, 2020

Filing, Witness and Other Fees: \$2,362

DATE	VENDOR	PURPOSE
3/26/2020	Metro Attorney Service Inc.	Service of subpoena to produce documents upon PricewaterhouseCoopers LLP
4/23/2020	Metro Attorney Service Inc.	Service of subpoenas to produce documents upon Goldman, Sachs & Co., J.P. Morgan Securities LLC, Barclays Capital Inc., Deutsche Bank Securities Inc., RBC Capital Markets, LLC, Citigroup Global Markets Inc., Morgan Stanley & Co. LLC, SunTrust Robinson Humphrey, Inc., TD Securities (USA) LLC, and MUFG Securities Americas Inc.
10/14/2020	Metro Attorney Service Inc.	Service of subpoena to testify at a deposition upon Lori Minnihan

EXHIBIT D

EXHIBIT D

Pelletier v. Endo International PLC, et al., No. 2:17-cv-05114-MMB
Prior Lead Plaintiff's Counsel

Transportation, Hotels & Meals: \$28,331

DATE	NAME	DESTINATION	PURPOSE
1/5/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Lead Plaintiff Briefing
1/30/2018	Joseph A. Fonti	New York, New York	After-hours Taxi - Lead Plaintiff Briefing
1/30/2018	Michael Russo	New York, New York	After-hours Taxi - Lead Plaintiff Briefing
2/6/2018	Michael Russo	New York, New York	After-hours Taxi - Lead Plaintiff Briefing
2/6/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Lead Plaintiff Briefing
2/6/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Lead Plaintiff Briefing
2/6/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Lead Plaintiff Briefing
2/15/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Lead Plaintiff Briefing
2/16/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Lead Plaintiff Briefing
2/20/2018	Javier Bleichmar	Philadelphia, Pennsylvania	Travel Dinner - Lead Plaintiff Hearing
2/20/2018	Javier Bleichmar	Philadelphia, Pennsylvania	Train fare, fees, and tax - Lead Plaintiff Hearing
2/20/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Train to Lead Plaintiff Hearing
2/21/2018	Javier Bleichmar	Philadelphia, Pennsylvania	Out of Town Transportation - Lead Plaintiff Hearing
2/21/2018	Javier Bleichmar	Philadelphia, Pennsylvania	Taxi to Attend Lead Plaintiff Hearing
2/20/2018 - 2/21/2018	Javier Bleichmar	Philadelphia, Pennsylvania	Hotel Room - Lead Plaintiff Hearing
2/20/2018 - 2/21/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Room - Lead Plaintiff Hearing
2/20/2018 - 2/21/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Tax - Lead Plaintiff Hearing

DATE	NAME	DESTINATION	PURPOSE
2/28/2018	Elliott Greenleaf, P.C.	Philadelphia, Pennsylvania	Parking - Lead Plaintiff Hearing
2/28/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Out of Town Transportation through Travel Agency and Fees - Travel to Lead Plaintiff Hearing
6/22/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Drafting Endo Complaint
6/25/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
6/28/2018	William Green	New York, New York	After-hours Dinner -Drafting Endo Complaint
6/29/2018	William Geraci	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/4/2018	Joseph A. Fonti	New York, New York	Airline Fee - Endo Complaint Due Date Change
7/5/2018	Jake Nachmani	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/9/2018	William Green	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/10/2018	Franklyn Williams	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/10/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/10/2018	Jake Nachmani	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/11/2018	William Green	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/12/2018	William Green	New York, New York	After-hours Dinner -Drafting Endo Complaint
7/15/2018	Joseph A. Fonti	New York, New York	Weekend Breakfast – Drafting Endo Complaint
7/15/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/15/2018	Jake Nachmani	New York, New York	After-hours Taxi - Endo Complaint
7/15/2018	Jake Nachmani	New York, New York	After-hours Taxi - Endo Complaint
7/15/2018	Jake Nachmani	New York, New York	Weekend Lunch - Drafting Endo Complaint
7/15/2018	Joseph A. Fonti, Wilson M. Meeks III, Thayne Stoddard, William Geraci	New York, New York	Weekend Lunch – Drafting Endo Complaint

DATE	NAME	DESTINATION	PURPOSE
7/16/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/16/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/17/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/19/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/19/2018	Jake Nachmani	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/20/2018	William Geraci	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/20/2018	William Green	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/22/2018	Jake Nachmani	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/22/2018	Jake Nachmani	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/22/2018	Jake Nachmani	New York, New York	Weekend Dinner – Drafting Endo Complaint
7/22/2018	Jake Nachmani	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/22/2018	Thayne Stoddard	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/22/2018	William Green	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/22/2018	William Green	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/22/2018	Wilson M. Meeks III	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/22/2018	Wilson M. Meeks III	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/23/2018	J. Nachmani	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/23/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/23/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/24/2018	William Green	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/25/2018	Jake Nachmani	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/26/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint

DATE	NAME	DESTINATION	PURPOSE
7/27/2018	Franklyn Williams	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/28/2018	Franklyn Williams	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/28/2018	Jake Nachmani	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/28/2018	Jake Nachmani	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/28/2018	Jake Nachmani	New York, New York	Weekend Dinner – Drafting Endo Complaint
7/28/2018	Jake Nachmani	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/28/2018	Joseph A. Fonti	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/28/2018	Thayne Stoddard	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/28/2018	William Geraci	New York, New York	Weekend Dinner – Drafting Endo Complaint
7/28/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/28/2018	Wilson M. Meeks III	New York, New York	Weekend Dinner – Drafting Endo Complaint
7/28/2018	Wilson M. Meeks III	New York, New York	Weekend Drink/Snack – Drafting Endo Complaint
7/29/2018	Franklyn Williams	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/29/2018	Jake Nachmani	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/29/2018	Jake Nachmani	New York, New York	Weekend Dinner – Drafting Endo Complaint
7/29/2018	Jake Nachmani	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/29/2018	Joseph A. Fonti	New York, New York	Weekend Breakfast – Drafting Endo Complaint
7/29/2018	Joseph A. Fonti	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/29/2018	Thayne Stoddard	New York, New York	Weekend Lunch – Drafting Endo Complaint
7/29/2018	Thayne Stoddard	New York, New York	Weekend Dinner – Drafting Endo Complaint
7/29/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/29/2018	Wilson M. Meeks III	New York, New York	Weekend Taxi – Drafting Endo Complaint

DATE	NAME	DESTINATION	PURPOSE
7/29/2018	Wilson M. Meeks III	New York, New York	Weekend Taxi – Drafting Endo Complaint
7/29/2018	Jake Nachmani	New York, New York	Weekend Drink/Snack – Drafting Endo Complaint
7/30/2018	Joseph Fonti	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/30/2018	Jake Nachmani	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/30/2018	Jake Nachmani	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/30/2018	William Green	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/30/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/30/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/30/2018 - 8/1/2018	Joseph A. Fonti	New York, New York	Hotel Room - Drafting Endo Complaint
7/30/2018 - 8/1/2018	Joseph A. Fonti	New York, New York	Hotel Destination Fee – Drafting Endo Complaint
7/30/2018 - 8/1/2018	Joseph A. Fonti	New York, New York	Hotel Tax - Drafting Endo Complaint
7/31/2018	Franklyn Williams	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/31/2018	Jake Nachmani	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/31/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Drafting Endo Complaint
7/31/2018	Thayne Stoddard	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/31/2018	William Geraci	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/31/2018	William Green	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/31/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
7/31/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Drafting Endo Complaint
8/1/2018	Franklyn Williams	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/1/2018	Joseph A. Fonti	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/1/2018	Michael Russo	New York, New York	After-hours Dinner – Drafting Endo Complaint

DATE	NAME	DESTINATION	PURPOSE
8/1/2018	Thayne Stoddard	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/1/2018	William Green	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/1/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/1/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Endo Complaint
8/1/2018 - 8/3/2018	Michael Russo	New York, New York	Hotel Room - Finalizing and filing Endo Complaint
8/1/2018 - 8/3/2018	Michael Russo	New York, New York	Hotel Destination Fee and Taxes – Finalizing and filing Endo Complaint
8/2/2018	Franklyn Williams	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/2/2018	Jake Nachmani	New York, New York	After-hours Taxi – Drafting Endo Complaint
8/2/2018	Jake Nachmani	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/2/2018	Kendra Schramm	New York, New York	After-hours Taxi – Drafting Endo Complaint
8/2/2018	Michael Russo	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/2/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Drafting Endo Complaint
8/2/2018	Thayne Stoddard	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/2/2018	William Geraci	New York, New York	After-hours Taxi – Drafting Endo Complaint
8/2/2018	William Geraci	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/2/2018	William Green	New York, New York	After-hours Dinner – Drafting Endo Complaint
8/2/2018	William Green	New York, New York	After-hours Taxi – Drafting Endo Complaint
8/2/2018 - 8/3/2018	Wilson M. Meeks III	New York, New York	Hotel Room - Finalizing and filing Endo Complaint
8/2/2018 - 8/3/2018	Wilson M. Meeks III	New York, New York	Hotel Fee - Finalizing and filing Endo Complaint
8/3/2018	Joseph A. Fonti	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Jake Nachmani	New York, New York	After-hours Taxi – Drafting Endo Complaint

DATE	NAME	DESTINATION	PURPOSE
8/3/2018	Jake Nachmani	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Kendra Schramm	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Michael Russo	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Thayne Stoddard	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/3/2018	William Geraci	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	William Geraci	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/3/2018	William Green	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/3/2018	William Green	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/3/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Finalizing and Filing Endo Complaint
8/4/2018	Jake Nachmani	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/4/2018	Joseph A. Fonti	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/4/2018	Michael Russo	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/4/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/4/2018	William Geraci	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/4/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Finalizing and Filing Endo Complaint
8/4/2018	Kendra Schramm	New York, New York	After-hours Taxi - Endo Complaint

DATE	NAME	DESTINATION	PURPOSE
8/9/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner – Review Endo Complaint
9/10/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
9/15/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
9/16/2018	Joseph A. Fonti	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
9/16/2018	William Green	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
9/16/2018	William Green	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
9/16/2018	Jake Nachmani	New York, New York	Weekend Breakfast - Motion to Dismiss Briefing
9/17/2018	Franklyn Williams	New York, New York	After-hours Dinner – Motion to Dismiss Briefing
9/17/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
9/18/2018	Franklyn Williams	New York, New York	After-hours Dinner – Motion to Dismiss Briefing
9/18/2018	William Green	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
9/19/2018	William Green	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
9/20/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Train fare and fees to attend motion to dismiss hearing in <i>S.E.B. Inv. Mgmt. AB v. Endo Int'l plc</i> , No. 17-cv-3711 (E.D. Pa.)
9/25/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
9/26/2018	Elliott Greenleaf, P.C.	Philadelphia, Pennsylvania	Parking - Motion to dismiss hearing in <i>S.E.B. Inv. Mgmt. AB v. Endo Int'l plc</i> , No. 17-cv-3711 (E.D. Pa.)
9/26/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Breakfast on train to attend motion to dismiss hearing in <i>S.E.B. Inv. Mgmt. AB v. Endo Int'l plc</i> , No. 17-cv-3711 (E.D. Pa.)
9/26/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Taxi to attend motion to dismiss hearing in <i>S.E.B. Inv. Mgmt. AB v. Endo Int'l plc</i> , No. 17-cv-3711 (E.D. Pa.)

DATE	NAME	DESTINATION	PURPOSE
9/26/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Train fee to attend motion to dismiss hearing in <i>S.E.B. Inv. Mgmt. AB v. Endo Int'l plc</i> , No. 17-cv-3711 (E.D. Pa.)
9/26/2018	Joseph A. Fonti	Philadelphia, Pennsylvania	Return train fare and fees from motion to dismiss hearing in <i>S.E.B. Inv. Mgmt. AB v. Endo Int'l plc</i> , No. 17-cv-3711 (E.D. Pa.)
9/27/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
9/27/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/2/2018	Jake Nachmani	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/3/2018	Franklyn Williams	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/4/2018	Susan R. Podolsky	New York, New York	Airfare to New York, NY - Motion to Dismiss Briefing
10/4/2018	William Green	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/4/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/4/2018 - 10/6/2018	Susan R. Podolsky	New York, New York	Hotel Room – Opposition to Motion to Dismiss Briefing
10/9/2018	Jake Nachmani	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/9/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/9/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/10/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/13/2018	Jake Nachmani	New York, New York	Weekend Taxi - Motion to Dismiss Briefing
10/13/2018	Jake Nachmani	New York, New York	Weekend Taxi - Motion to Dismiss Briefing
10/13/2018	Jake Nachmani	New York, New York	Weekend Dinner - Motion to Dismiss Briefing
10/13/2018	Joseph A. Fonti	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/13/2018	Wilson M. Meeks III	New York, New York	Weekend Taxi - Motion to Dismiss Briefing

DATE	NAME	DESTINATION	PURPOSE
10/14/2018	Franklyn Williams	New York, New York	Weekend Lunch – Motion to Dismiss Briefing
10/14/2018	Joseph A. Fonti	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/14/2018	Jake Nachmani	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/14/2018	Wilson M. Meeks III	New York, New York	Weekend Drink/Snack - Motion to Dismiss Briefing
10/16/2018	Franklyn Williams	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/16/2018	Jake Nachmani	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/18/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/20/2018	Joseph A. Fonti	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/20/2018	William Geraci	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/20/2018	Wilson M. Meeks III	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/20/2018	Wilson M. Meeks III	New York, New York	Weekend Dinner - Motion to Dismiss Briefing
10/21/2018	Joseph A. Fonti	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/21/2018	Jake Nachmani	New York, New York	Weekend Lunch - Motion to Dismiss Briefing
10/21/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/22/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/22/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/23/2018	Thayne Stoddard	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/24/2018	Susan R. Podolsky	New York, New York	Airfare to New York, NY – Motion to Dismiss Briefing
10/24/2018	Susan R. Podolsky	New York, New York	Taxi to Hotel – Motion to Dismiss Briefing
10/24/2018	Jake Nachmani	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/24/2018	Michael Russo	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/24/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing

DATE	NAME	DESTINATION	PURPOSE
10/24/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/24/2018	Wilson M. Meeks III	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/24/2018 - 10/26/2018	Michael Russo	New York, New York	Hotel Room - Filing Opposition to Motion to Dismiss
10/24/2018 - 10/26/2018	Michael Russo	New York, New York	Hotel Fees and Taxes – Filing Opposition to Motion to Dismiss
10/24/2018 - 10/27/2018	Wilson M. Meeks III	New York, New York	Hotel Room - Filing Opposition to Motion to Dismiss
10/24/2018 - 10/27/2018	Wilson M. Meeks III	New York, New York	Hotel Fee - Filing Opposition to Motion to Dismiss
10/24/2018 - 10/27/2018	Wilson M. Meeks III	New York, New York	Hotel Tax - Filing Opposition to Motion to Dismiss
10/25/2018	Franklyn Williams	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/25/2018	Jake Nachmani	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/25/2018	Michael Russo	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/25/2018	Thayne Stoddard	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/25/2018	William Green	New York, New York	After-hours Taxi - Motion to Dismiss Briefing
10/25/2018	William Green	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
10/25/2018 - 10/26/2018	Joseph A. Fonti	New York, New York	Hotel Room, Fees, and Tax - Filing Opposition to Motion to Dismiss
10/25/2018 - 10/26/2018	Jake Nachmani	New York, New York	Hotel Room, Fees, and Tax - Filing Opposition to Motion to Dismiss
10/26/2018	Franklyn Williams	New York, New York	After-hours Dinner – Finalize and File Opposition to Motion to Dismiss
10/26/2018	Jake Nachmani	New York, New York	After-hours Dinner – Finalize and File Opposition to Motion to Dismiss

DATE	NAME	DESTINATION	PURPOSE
10/26/2018	Michael Russo	New York, New York	After-hours Taxi – Finalize and File Opposition to Motion to Dismiss
10/26/2018	Thayne Stoddard	New York, New York	After-hours Taxi – Finalize and File Opposition to Motion to Dismiss
10/26/2018	Thayne Stoddard	New York, New York	After-hours Dinner – Finalize and File Opposition to Motion to Dismiss
10/26/2018	William Green	New York, New York	After-hours Dinner – Finalize and File Opposition to Motion to Dismiss
10/26/2018	Wilson M. Meeks III	New York, New York	After-hours Taxi – Finalize and File Opposition to Motion to Dismiss
10/26/2018	Joseph A. Fonti, Wilson M. Meeks III, Susan R. Podolsky, William Geraci	New York, New York	After-hours Dinner – Finalize and File Opposition to Motion to Dismiss
10/28/2018	Susan R. Podolsky	New York, New York	Hotel Room – Finalize and File Motion to Dismiss
10/28/2018	Susan R. Podolsky	New York, New York	Taxi on Return Travel – Finalize and File Motion to Dismiss
10/28/2018	Susan R. Podolsky	New York, New York	Train (New York, NY to Washington, DC) – Finalize and File Motion to Dismiss
10/28/2018	Jake Nachmani	New York, New York	Weekend Breakfast – Work re Courtesy Copies for Motion to Dismiss Briefing
11/6/2018	Franklyn Williams	New York, New York	After-hours Dinner – Motion to Dismiss
11/12/2018	Michael Russo	New York, New York	After-hours Taxi - Motion to Dismiss
1/9/2019	William Green	New York, New York	After-hours Dinner – Mediation Preparations
1/13/2019	Wilson M. Meeks III	New York, New York	After-hours Taxi - Mediation Briefing
1/25/2019	Wilson M. Meeks III	New York, New York	After-hours Dinner - Mediation Preparations
2/3/2019	Wilson M. Meeks III	New York, New York	Weekend Lunch - Mediation Preparations
2/3/2019	Wilson M. Meeks III	New York, New York	Weekend Taxi - Mediation Preparation

DATE	NAME	DESTINATION	PURPOSE
2/3/2019	Wilson M. Meeks III	New York, New York	Weekend Taxi - Mediation Preparation
2/4/2019	Joseph A. Fonti	New York, New York	Taxi to Mediation
2/4/2019	Joseph A. Fonti	New York, New York	Taxi from Mediation
2/28/2019	William Green	New York, New York	After-hours Dinner – Motion to Dismiss
3/31/2019	Joseph A. Fonti	New York, New York	Weekend Lunch - Motion to Dismiss Oral Argument Preparations
6/3/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Train fare and fees to attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)
6/7/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Travel Drink/Snack - attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)
6/7/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Travel Lunch - attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)
6/7/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Taxi to attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)
6/7/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Taxi to attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)
6/7/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Taxi to attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)
6/7/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Train to attend Endo-related hearing in <i>In re Generic Pharm. Pricing Antitrust Litig.</i> , No. 16-md-2724 (E.D. Pa.)

DATE	NAME	DESTINATION	PURPOSE
6/12/2019	William Green	Philadelphia, Pennsylvania	Cancellation fee for train ticket to cancelled Motion to Dismiss hearing
6/14/2019	Susan R. Podolsky	New York, New York	Airfare to New York, NY – Motion to Dismiss Oral Argument Preparations
6/14/2019	Susan R. Podolsky	New York, New York	Hotel Room – Motion to Dismiss Oral Argument Preparations
6/14/2019	Susan R. Podolsky	New York, New York	Taxi to Hotel — Motion to Dismiss Oral Argument Preparations
6/15/2019	Susan R. Podolsky	New York, New York	Train to Washington, D.C. – Motion to Dismiss Oral Argument Preparations
6/15/2019	Susan R. Podolsky	New York, New York	Parking– Motion to Dismiss Oral Argument Preparations
6/15/2019	Thayne Stoddard	New York, New York	Weekend Lunch - Motion to Dismiss Oral Argument Preparations
8/9/2019	Joseph A. Fonti	Alexandria, Virginia	Train fare and fees - Motion to Dismiss Oral Argument Preparations
8/12/2019	Joseph A. Fonti	Alexandria, Virginia	Taxi - Motion to Dismiss Oral Argument Preparations
8/12/2019	Joseph A. Fonti	Alexandria, Virginia	Taxi - Motion to Dismiss Oral Argument Preparations
8/14/2019	Joseph A. Fonti, Susan R. Podolsky	Alexandria, Virginia	After-hours Dinner - Motion to Dismiss Oral Argument Preparations
8/14/2019	Joseph A. Fonti	Alexandria, Virginia	Travel Drink/Snack - Motion to Dismiss Oral Argument Preparations
8/14/2019	Joseph A. Fonti	Alexandria, Virginia	Travel Lunch - Motion to Dismiss Oral Argument Preparations
8/14/2019	Joseph A. Fonti	Alexandria, Virginia	Taxi - Motion to Dismiss Oral Argument Preparations
8/15/2019	Joseph A. Fonti	Alexandria, Virginia	Hotel Room - Motion to Dismiss Oral Argument Preparations
8/15/2019	Joseph A. Fonti	Alexandria, Virginia	Hotel Tax - Motion to Dismiss Oral Argument Preparations

DATE	NAME	DESTINATION	PURPOSE
8/15/2019	Joseph A. Fonti	Alexandria, Virginia	Taxi - Motion to Dismiss Oral Argument Preparations
8/15/2019	Joseph A. Fonti, Susan R. Podolsky	Alexandria, Virginia	After-hours Dinner - Motion to Dismiss Oral Argument Preparations
9/4/2019	Susan R. Podolsky	New York, New York	Airfare to New York, NY - Motion to Dismiss Oral Argument Preparations
9/4/2019	Susan R. Podolsky	New York, New York	Taxi to Hotel - Motion to Dismiss Oral Argument Preparations
9/4/2019 - 9/6/2019	Susan R. Podolsky	New York, New York	Hotel Room – Motion to Dismiss Oral Argument Preparations
9/6/2019	Susan R. Podolsky	New York, New Y	Train to Washington, D.C. - Motion to Dismiss Oral Argument Preparations
9/9/2019	Michael Russo	Philadelphia, Pennsylvania	Train - Motion to Dismiss Oral Argument
9/13/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Parking - Motion to Dismiss Oral Argument
9/15/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Travel Drinks/Snacks - Motion to Dismiss Oral Argument
9/15/2019	Susan R. Podolsky	Philadelphia, Pennsylvania	Train to Philadelphia, PA – Motion to Dismiss Oral Argument
9/15/2019 – 9/19/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Parking - Motion to Dismiss Oral Argument
9/15/2019 – 9/19/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Room - Motion to Dismiss Oral Argument
9/15/2019 – 9/19/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Room Taxes - Motion to Dismiss Oral Argument
9/15/2019 – 9/19/2019	Susan R. Podolsky	Philadelphia, Pennsylvania	Hotel Room - Motion to Dismiss Oral Argument
9/15/2019 – 9/19/2019	Susan R. Podolsky	Philadelphia, Pennsylvania	Hotel Room Taxes - Motion to Dismiss Oral Argument
9/16/2019	Joseph A. Fonti, Susan R. Podolsky	Philadelphia, Pennsylvania	Travel Lunch - Motion to Dismiss Oral Argument

DATE	NAME	DESTINATION	PURPOSE
9/16/2019	William Green	New York, New York	After-hours Dinner - Motion to Dismiss Oral Argument Preparations
9/17/2019	Michael Russo, Evan Kubota, and Thayne Stoddard	Philadelphia, Pennsylvania	Travel Dinner - Motion to Dismiss Oral Argument
9/17/2019	Evan Kubota	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/17/2019	Evan Kubota	Philadelphia, Pennsylvania	Train - Motion to Dismiss Oral Argument
9/17/2019	Michael Russo	Philadelphia, Pennsylvania	Travel Lunch - Motion to Dismiss Oral Argument
9/17/2019	Michael Russo	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/17/2019	Michael Russo	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/17/2019	Michael Russo	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/17/2019	Michael Russo	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/17/2019	Michael Russo	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/17/2019	Thayne Stoddard	Philadelphia, Pennsylvania	Train - Motion to Dismiss Oral Argument
9/18/2019	Elliott Greenleaf, P.C.	Philadelphia, Pennsylvania	Parking - Motion to Dismiss Oral Argument
9/18/2019	Evan Kubota	Philadelphia, Pennsylvania	Hotel Room - Motion to Dismiss Oral Argument
9/18/2019	Evan Kubota	Philadelphia, Pennsylvania	Travel Breakfast - Motion to Dismiss Oral Argument
9/18/2019	Joseph A. Fonti, Susan R. Podolsky, William M. Meeks III, Evan A. Kubota, Thayne Stoddard, Michael Russo	Philadelphia, Pennsylvania	Travel Dinner - Motion to Dismiss Oral Argument
9/18/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Meals - Motion to Dismiss Oral Argument
9/18/2019	Michael Russo	Philadelphia, Pennsylvania	Hotel Room - Motion to Dismiss Oral Argument
9/18/2019	Michael Russo	Philadelphia, Pennsylvania	Hotel Room Taxes - Motion to Dismiss Oral Argument
9/18/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Parking - Motion to Dismiss Oral Argument
9/18/2019	Thayne Stoddard	Philadelphia, Pennsylvania	Hotel Room - Motion to Dismiss Oral Argument

DATE	NAME	DESTINATION	PURPOSE
9/18/2019	Thayne Stoddard	Philadelphia, Pennsylvania	Hotel Room Taxes - Motion to Dismiss Oral Argument
9/18/2019	Thayne Stoddard	Philadelphia, Pennsylvania	Hotel Meals - Motion to Dismiss Oral Argument
9/18/2019	Susan R. Podolsky	Philadelphia, Pennsylvania	Train to Washington, D.C.
9/18/2019	Susan R. Podolsky	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
9/19/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Conference Room - Motion to Dismiss Oral Argument
9/19/2019	Joseph A. Fonti, Susan R. Podolsky	Philadelphia, Pennsylvania	Hotel Conference Room Dinner - Motion to Dismiss Oral Argument
9/19/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Conference Room Fees - Motion to Dismiss Oral Argument
9/19/2019	Joseph A. Fonti	Philadelphia, Pennsylvania	Hotel Conference Room Taxes - Motion to Dismiss Oral Argument
9/19/2019	Michael Russo	Philadelphia, Pennsylvania	Taxi - Motion to Dismiss Oral Argument
10/1/2019	William Green	New York, New York	After-hours Dinner - Motion to Dismiss Briefing
9/3/2020	Masiel Feliz	New York, New York	After-hours Taxi - Deposition Preparations
9/3/2020	Masiel Feliz	New York, New York	After-hours Taxi - Deposition Preparations
9/4/2020	Masiel Feliz	New York, New York	After-hours Taxi - Deposition Preparations
9/8/2020	Masiel Feliz	New York, New York	After-hours Taxi - Deposition Preparations
10/2/2020	Masiel Feliz	New York, New York	After-hours Taxi - Deposition Preparations
10/16/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/16/2020	William Green	New York, New York	After-hours Dinner – Deposition Preparations
10/17/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/17/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/17/2020	William Green	New York, New York	Weekend Dinner – Deposition Preparations

DATE	NAME	DESTINATION	PURPOSE
10/18/2020	Mathew Hough	New York, New York	After-hours Taxi - Deposition Preparations
10/18/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/18/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/18/2020	William Green	New York, New York	Weekend Dinner – Deposition Preparations
10/19/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/19/2020	William Green	New York, New York	After-hours Dinner – Deposition Preparations
10/20/2020	Mathew Hough	White Plains, New York	Rental Car Parking to attend P. Raimer deposition
10/21/2020	William Green	New York, New York	After-hours Dinner – Deposition Preparations
10/21/2020	William Green	New York, New York	After-hours Drink/Snack – Deposition Preparations
10/22/2020	Mathew Hough	New York, New York	After-hours Taxi - Deposition Preparations
10/22/2020	William Green	New York, New York	After-hours Taxi - Deposition Preparations
10/23/2020	Mathew Hough	White Plains, New York	Taxi to attend P. Raimer deposition
10/25/2020	Mathew Hough	White Plains, New York	Rental car to attend and P. Raimer depositions
10/25/2020	Mathew Hough	White Plains, New York	Rental car gas to attend P. Raimer deposition
11/9/2020	Thayne Stoddard	New York, New York	After-hours Taxi - Mediation Preparations
11/16/2020	Mathew Hough	White Plains, New York	Rental car to attend L. Minnihan deposition
11/19/2020	Mathew Hough	White Plains, New York	Rental car parking to attend M. Reiney deposition
11/22/2020	Mathew Hough	White Plains, New York	Rental car to attend C. Propst deposition
12/3/2020	Mathew Hough	White Plains, New York	Rental car parking to attend S. Upadhyay deposition
12/5/2020	Mathew Hough	White Plains, New York	Rental car to attend S. Upadhyay deposition
12/5/2020	Mathew Hough	White Plains, New York	Rental car gas to attend S. Upadhyay deposition

EXHIBIT E

EXHIBIT E

Pelletier v. Endo International PLC, et al., No. 2:17-cv-05114-MMB
Prior Lead Plaintiff's Counsel

Court Hearing Transcripts and Deposition Reporting, Transcripts and Videography: \$52,744

DATE	VENDOR	PURPOSE
02/26/2018	Kathleen Feldman	Transcript of Lead Plaintiff hearing
09/03/2019	Diana Doman Transcribing, LLC	Transcript of motion to dismiss hearing in <i>Kaminski v. Cigna Corp.</i> , No. 2:02-cv-8088-MMB
10/16/2019	O'Connor Legal	Transcript of motion to dismiss hearing
07/29/2020	Veritext Legal Solutions	07/27/2020 Certified transcript of the deposition of Zachary Nye, Ph.D. 07/27/2020 Exhibit Share for the deposition of Zachary Nye, Ph.D.
09/18/2020	Veritext Legal Solutions	07/27/2020 Video of the deposition of Zachary Nye, Ph.D.
10/20/2020	Veritext Legal Solutions	10/20/2020 Certified transcript and video of the deposition of Patrick Raimer
11/05/2020	Veritext Legal Solutions	09/10/2020 Certified transcript and video of the deposition of Douglas Skinner, Ph.D.
11/06/2020	Veritext Legal Solutions	10/23/2020 Certified transcript and video of the deposition of Lori Minnihan
11/29/2020	Veritext Legal Solutions	11/20/2020 Certified transcript of the deposition of Michael Reiney
11/29/2020	Veritext Legal Solutions	11/18/2020 Certified transcript of the deposition of Charles "Trey" Propst
12/07/2020	Veritext Legal Solutions	11/18/2020 Video of the deposition of Charles "Trey" Propst
12/09/2020	Veritext Legal Solutions	11/20/2020 Video of the deposition of Michael Reiney
12/13/2020	Veritext Legal Solutions	12/4/2020 Certified transcript of the deposition of Suketu Upadhyay
01/21/2021	Veritext Legal Solutions	12/4/2020 Video of the deposition of Suketu Upadhyay
02/22/2021	Veritext Legal Solutions	10/20/2020 Delivery and handling fee re the deposition of Patrick Raimer
05/04/2021	Veritext Legal Solutions	04/26/2021 Certified transcript of the deposition of Warren Pefley
05/19/2021	Veritext Legal Solutions	05/06/2021 Video of the deposition of Donald Degolyer
06/11/2021	Veritext Legal Solutions	05/25/2021 Video of the deposition of Shane Cooke

EXHIBIT F

EXHIBIT F

Pelletier v. Endo International PLC, et al., No. 2:17-cv-05114-MMB
Prior Lead Plaintiff's Counsel

Photocopies: \$591

In-House Photocopies by Elliott Greenleaf P.C.: \$325

Outside Photocopies: \$266

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
06/19/2019	Met Photo Inc.	Demonstratives for Motion to Dismiss oral argument

EXHIBIT G



FIRM RESUME



OVERVIEW

Bleichmar Fonti & Auld LLP (“BFA” or the “Firm”) is a law firm based in New York City with offices in Oakland, California; Toronto, Ontario; and Westchester, New York. The Firm has recovered more than \$18 billion for its clients since its founding in 2014. The Firm focuses solely on affirmative litigation in highly significant matters, including securities, consumer and antitrust actions both in the United States and abroad. We represent a wide range of domestic and foreign clients, including some of the largest institutional investors and asset managers in the world as well as small businesses and individuals.

Three unique aspects of our firm distinguish BFA from others: (1) our selectivity in choosing cases; (2) the high quality lawyering our diverse team provides; and (3) a commitment to our clients’ needs ahead of our own. With these characteristics, BFA enjoys a reputation as a highly ethical, discerning, and sophisticated firm.

First, we are extremely selective in the cases we choose to litigate, and the strength of our litigation skills is second to none. Our clients’ reputations are at stake in every case they pursue, and we guard their reputations zealously. As a result, we are often asked by our clients to serve as the dissenting voice when our peers are recommending a case we do not like. We only recommend cases that fit within our clients’ objectives and do so very seldomly.

Second, BFA’s attorneys have decades of experience litigating complex, high profile cases of import. We launched BFA in large measure to break away from many of the standard practices of the more established and larger plaintiffs’ firms. We do not hold an “inventory” of cases (which effectively includes weak ones) to ensure a steady cash-flow stream over the years. The high quality of our lawyers and our successful case resolutions allows us to carry out that strategy.

We strive for quality and not quantity in every aspect of our practice. This allows us to dedicate a significant amount of resources to each individual case. Complex litigation requires a substantial investment of money, time, and resources. It is only with dedicated resources that a well thought-out litigation strategy can be executed forcefully and effectively. We don’t spread ourselves too thin and instead strive to take cases deep into litigation. Our results, discussed below, show that we obtain outsized settlements and reflect the high quality of our work product.

Third, we strive to provide our clients with objective, comprehensive counsel, including about whether or not participation in specific litigation serves the best interests of the client. We have a strong commitment to candid and unvarnished advice, made possible through our independence from litigation funding. In addition, BFA provides advice on multiple other aspects such as the development of the law and the risk of fee-shifting provisions, as well as the reputational risk, if any, of participating in any particular litigation.



In sum, we are distinguished by our candid counsel, deep experience, and proven results.

SECURITIES LITIGATION HIGHLIGHTS

BFA partners have represented lead plaintiffs in dozens of securities class actions, as well as investors in direct actions, including the cases featured below.

The Police Retirement System of St. Louis v. Granite Construction Incorporated, et al.

- Northern District of California, No. 19-cv-04744
- Client: The Police Retirement System of St. Louis
- Lead Attorneys: Javier Bleichmar, Peter E. Borkon

Case Status:
Proposed Settlement
Pending Court
Approval

Background: Plaintiffs allege that Granite and its senior management fraudulently misrepresented the impact of several of the company's largest joint venture construction projects on Granite's business. Specifically, plaintiffs assert that Granite and its senior management understated the significant cost overruns and schedule delays the Company was experiencing as well as their impact on Granite's financial statements.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff the Police Retirement System of St. Louis.

Status: The Court appointed the Police Retirement System of St. Louis on November 26, 2019 and approved its choice of BFA as Lead Counsel on January 16, 2020. BFA filed an amended complaint on February 20, 2020. In May 2020, Judge Alsup denied defendants' motion to dismiss. In January 2021, Judge Alsup certified the class, naming the Police Retirement System of St. Louis as class representative and Bleichmar Fonti & Auld LLP as class counsel. After beginning discovery and taking a number of depositions, the parties reached a \$129 million settlement, representing as much as 30% of the estimated recoverable damages available at trial. This settlement was reached following three rounds of mediation totaling 20 hours of mediation, including the last round lasting 11 hours. The Court granted preliminary approval of the settlement on October 6, 2021.



Ontario Teachers' Pension Plan Board, et al v. Teva Pharmaceutical Industries Ltd. et al.

- District of Connecticut, No. 17-cv-00558
- Clients: Ontario Teachers' Pension Plan Board and Anchorage Police and Fire Retirement System
- Lead Attorney: Joseph A. Fonti

Case Status:
Pending

Background: Plaintiffs allege that the company and its senior management made materially false and misleading statements that concealed that Teva had engaged in a multi-year scheme to exponentially increase generic drug prices across its portfolio, in some instances by more than 1000%. Often, these increases were in lock-step with so-called competitors.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff Ontario Teachers' and named plaintiff Anchorage Police and Fire Retirement System.

Status: The Court appointed Ontario Teachers' as Lead Plaintiff and approved its choice of BFA as Lead Counsel on July 11, 2017. BFA filed an amended complaint on June 22, 2018. In September 2019, the Court denied defendants' motion to dismiss and in December 2019, BFA filed a further amended complaint. In March 2020, the Court granted BFA's motion for consolidation. On March 9, 2021, Judge Underhill granted BFA's motion to certify a class of Teva investors. Judge Underhill also granted BFA's motion to appoint the Ontario Teachers' Pension Plan Board and Anchorage Police and Fire Retirement System as Class Representatives, and BFA as Class Counsel. On January 18, 2022, Class Representatives filed their motion for preliminary approval of a settlement.

In re Citigroup Securities Litigation

- Southern District of New York, No. 20-CV-9132
- Client: Public Sector Pension Investment Board ("PSP")
- Lead Attorneys: Javier Bleichmar, Joseph A. Fonti, Erin H. Woods

Case Status:
Pending

Background: Plaintiffs allege that Citigroup and its senior management misrepresented and concealed that the company's internal controls and risk management systems suffered from serious and longstanding deficiencies that exposed the Company to massive regulatory penalties that will cost significantly more than \$1 billion to remediate.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff PSP.



Status: The Court appointed PSP as Lead Plaintiff and approved its choice of BFA as Lead Counsel on February 4, 2021. BFA filed an Amended Complaint on April 20, 2021.

In re Align Technology, Inc. Securities Litigation

- Northern District of California, No. 17-cv-5114
- Client: Macomb County Employee's Retirement System
- Lead Attorneys: Javier Bleichmar, Nancy Kulesa

Case Status:
Pending

Background: Plaintiffs allege Align and its senior management materially overstated the company's performance in China and misrepresented and concealed significant declines in demand for Align's products.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff Macomb County Employee's Retirement System.

Status: The Court appointed Macomb County Employee's Retirement System as Lead Plaintiff and approved its choice of BFA as Lead Counsel on May 20, 2020. After BFA filed an Amended Complaint, the Court dismissed the case on March 9, 2021 with the opportunity to replead. Lead Plaintiff filed an appeal on May 6, 2021. The appeal is pending.

MTA v. Allianz Global Investors U.S., L.L.C.

- Southern District of New York, No. 20-CV-7842
- Client: Metropolitan Transportation Authority
- Lead Attorneys: Javier Bleichmar, George Bauer

Case Status:
Pending

Background: Since 2008, the Metropolitan Transportation Authority ("MTA") invested nearly \$200 million in Allianz Global Investor's ("AllianzGI") Structured Alpha funds. Due to AllianzGI's negligent and imprudent trading strategies and its failure to implement adequate risk management procedures, despite its commitment to do so, the MTA lost over 90% of its investment. AllianzGI's failure cost the MTA and similar institutional investors hundreds of millions of dollars.

BFA's Role: BFA represents the MTA in their suit against AllianzGI.

Status: BFA filed a complaint against AllianzGI on behalf of the MTA in September 2020. On September 30, 2021, the Court denied defendants' motion to dismiss.



In re MF Global Holdings Ltd. Securities Litigation

- Southern District of New York, No. 11-cv-07866
- Client: Alberta Investment Management Corp. (AIMCo)
- Lead Attorneys: Javier Bleichmar, Dominic Auld

Total Settlements:
\$234.3 Million

Background: This litigation arose from MF Global's dramatic bankruptcy in October 2011. Plaintiffs alleged that Defendants misrepresented the company's risk controls, liquidity position, and exposure to European sovereign debt, and failed to properly account for its deferred tax assets.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo. Partners Javier Bleichmar and Dominic Auld represented AIMCo in this case since its inception in November 2011, and served as Court-appointed Co-Lead Counsel for the putative class since January 2012. When BFA launched in August 2014, the Court approved AIMCo's selection of BFA to serve as Co-Lead Counsel for the putative class, continuing the core litigation team's representation.

Status: Lead Counsel achieved five partial settlements worth a total of just over \$234 million on behalf of investors: (1) a \$74 million settlement with Goldman Sachs and certain other underwriters of the company's securities; (2) a \$64.5 million settlement with former officers and directors, including MF Global's former CEO Jon Corzine; (3) a \$65 million settlement with auditor PricewaterhouseCoopers; (4) a \$29.825 million settlement with Jefferies and other underwriters of the final bond offering issued during the Class Period; and (5) a separate \$932,828 settlement with another underwriter defendant associated with that last offering. These settlements represent a recovery of as much as 35% of the estimated recoverable damages available at trial – an excellent result, particularly in light of the issuer's bankruptcy.

These settlements were achieved after years of hard-fought litigation. Following the Court's decision sustaining the Complaint and denying Defendants' six motions to dismiss in their entirety, Co-Lead Counsel reviewed millions of documents produced by Defendants and third-parties, and conducted more than 50 depositions of former employees of MF Global and other key witnesses, including four days of testimony from former CEO Jon Corzine. The Court granted Plaintiffs' motion for class certification on October 14, 2015, which assisted in achieving the settlements.



In re Genworth Financial Inc. Securities Litigation

- Eastern District of Virginia, No. 14-cv-00682
- Client: Alberta Investment Management Corp. (AIMCo)
- Lead Attorney: Joseph A. Fonti

Total Settlement:
\$219 Million

Background: Plaintiffs alleged that Defendants misrepresented the profitability of the company's core business and reported false financial results by grossly understating long-term care insurance reserves. When Genworth announced a \$531 million charge to its reserves, the company's stock price fell more than 55% – wiping out billions in market capitalization – and credit rating agencies downgraded the company and its corresponding debt to “junk” status.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo. In November 2014, the Court approved AIMCo's selection of BFA to serve as Co-Lead Counsel for the putative class.

Notably, BFA secured one of the most thoroughly reasoned, investor-oriented decisions after the then-recent decision in *Omnicare v. Laborers District Council Construction Industry Pension Fund*, 135 S. Ct. 1318 (2015). The District Court ruled that Lead Plaintiffs had sufficiently pled that Defendants' statements were intended to mislead investors and to provide false assurances regarding the company's reserves. The District Court also largely sustained allegations that Defendants falsely certified that the company's internal controls were adequate.

Status: On March 10, 2016, Genworth announced a proposed settlement of \$219 million, the largest securities class action recovery achieved in the Eastern District of Virginia, and as much as 44% of estimated recoverable damages available at trial. BFA and AIMCo sought and achieved a significant contribution from the company beyond available insurance; despite significant liquidity issues, the company paid \$69 million, and the remaining \$150 million was funded by insurance.

The settlement was reached after 15 months of intense and complex litigation. The Eastern District of Virginia is known as the “rocket docket” for its rapid disposition of cases and strict adherence to schedule deadlines. In December 2014, Lead Plaintiffs filed a consolidated complaint and, in February 2015, Defendants filed a motion to dismiss. Partner Joseph Fonti successfully argued against the motion on April 28, 2015, and the securities fraud claims were sustained on May 1, 2015. Lead Plaintiffs filed their motion for class certification on December 3, 2015; fact discovery closed on January 15, 2016; and expert discovery closed on February 11, 2016. In effect, BFA conducted two to four years of litigation in just 15 months. This effort included more than 20 depositions, extensive trial preparation, and full briefing on motions for class



certification and summary judgment. At the time of settlement, BFA attorneys were preparing for trial, which was scheduled to begin on May 9, 2016.

In re Weatherford International Securities Litigation

- Southern District of New York, No. 12-cv-02121
- Client: Anchorage Police and Fire Retirement System
- Lead Attorney: Javier Bleichmar

Total Settlement:
\$120 Million

Background: Plaintiffs alleged that Weatherford, one of the world's largest oil and gas servicing companies, issued false financial statements that misled investors about its tax structure and internal controls. The company allegedly overstated its earnings by more than \$900 million and was forced to issue three restatements due to its failure to comply with Generally Accepted Accounting Principles.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff Anchorage Police and Fire Retirement System, and BFA partner Javier Bleichmar represented Anchorage continuously since the case was filed in March 2012.

Status: In June 2015, the company agreed to settle all claims for \$120 million of out-of-pocket cash, with no available insurance, or as much as 30% of recoverable damages available at trial. Achieving this settlement required more than three years of intense litigation, including defeating Defendants' motion to dismiss in its entirety; obtaining class certification; completing fact discovery, after more than 20 depositions and the review of more than eight million pages of documents; filing four expert reports; and preparing for expert discovery and summary judgment.

In re Computer Sciences Corp. Securities Litigation

- Eastern District of Virginia, No. 11-cv-00610
- Client: Ontario Teachers' Pension Plan Board
- Lead Attorney: Joseph A. Fonti

Total Settlement:
\$97.5 Million

Background: Plaintiffs alleged that the company and two of its executive officers misrepresented (i) a multi-billion dollar contract with the United Kingdom's National Health Service, and (ii) that the company's internal controls were adequate.

BFA Role: BFA partners Javier Bleichmar, Joseph A. Fonti, and Dominic Auld represented Court-appointed Lead Plaintiff Ontario Teachers' at all stages of this case. Upon the founding of the Firm, the Court approved Ontario Teachers' Pension Plan Board's selection of BFA as counsel, continuing the team's representation.



Status: On September 2013, the Court granted final approval to the \$97.5 million settlement. At that time, the settlement was the second largest all cash recovery achieved in the Eastern District of Virginia, and representing as much as 38% of recoverable damages at trial.

In re Celestica Inc. Securities Litigation

- Southern District of New York, No. 07-cv-00312
- Client: New Orleans Employees' Retirement System
- Lead Attorney: Joseph A. Fonti

**Total Settlement:
\$30 Million**

Background: Plaintiffs alleged false and misleading statements relating to a significant corporate restructuring plan, earnings, profitability, and financial outlook. When Celestica ultimately disclosed the truth, its stock price dropped 50%, reducing market capitalization by \$1.3 billion.

BFA's Role: BFA partners Joseph Fonti and Erin Woods represented Lead Plaintiffs in this litigation. Notably, Joseph was successful in arguing before the Court of Appeals for the Second Circuit, securing an investor-oriented interpretation of the pleading standard for scienter. Joseph also successfully argued in favor of Plaintiffs' class certification and summary judgment motions before the District Court, securing the first lower court decision after *Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S. Ct. 2398 (2014) in favor of investors on the issue of class-wide reliance.

Status: In April 2015, Plaintiffs filed a motion for preliminary approval of a proposed \$30 million settlement resolving all claims against the company and officer defendants. The final approval hearing was held on July 28, 2015 and, later that day, the Court approved the \$30 million settlement.

* * *

BFA attorneys have also played key roles in some of the most significant investor protection litigation in recent history, helping shareholders recover significant losses caused by financial misconduct in various industries across the marketplace. Select cases include:

In re Broadcom Corp. Class Action Litigation, Civ. No. 06-cv-5036 (C.D. Cal.).

This class action against Broadcom was based on allegations that the company inflated its stock price by intentionally backdating its stock option grants for over five years. Ultimately, the company was forced to issue a \$2.2 billion restatement of its financial statements for the period spanning from 1998 through 2005, which became the largest restatement ever due to options backdating.



The company acknowledged the “substantial evidence” of backdating, and lead plaintiffs secured a \$173.5 million settlement, which, at the time, was the second largest cash settlement ever involving a company accused of options backdating. This was also the only such case in which claims against the auditors were sustained.

In re HealthSouth Corp. Securities Litigation, Civ. No. 03-cv-1501-S (N.D. Ala.).

This case involved the largest securities fraud ever arising out of the healthcare industry, and ultimately resulted in a total settlement amount of \$804.5 million for the class. The class action involved claims against HealthSouth for falsifying its revenues and conducting a series of acquisition transactions in order to effectuate a massive fraud against the Medicare system.

False statements by the company and its officers led to the inflation of HealthSouth’s stock price, while at the same time company executives were amassing significant personal wealth by selling their own shares of HealthSouth stock.

Significantly, the litigation also resulted in the recovery of \$109 million from HealthSouth’s outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm.

In re Schering-Plough Corp. / ENHANCE Securities Litigation, Civ. No. 08-397 (D.N.J.).

Lead Plaintiffs brought litigation in the District of New Jersey against Schering-Plough Corporation and Merck/Schering-Plough Pharmaceuticals, and certain company officers, in *In re Schering-Plough Corp. / ENHANCE Securities Litigation*, alleging that they failed to disclose material information about the prospects of cholesterol-lowering drugs.

After nearly six years of litigation, Defendants agreed to pay \$473 million to settle the matter on the eve of trial. This marked the largest securities class action recovery in history obtained from a pharmaceutical company. Together with a related securities class action against Merck, the *ENHANCE* litigation settled for \$688 million.



CONSUMER LITIGATION HIGHLIGHTS

BFA Partner Lesley Weaver has been appointed to leadership positions in some of the most significant consumer actions of recent years, including: *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation*, which resulted in settlements totaling greater than \$15 billion; *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability*, which resulted in a settlement of \$307.5 million; and *In re Facebook, Inc. Consumer Privacy User Profile Litigation* and *In re Google RTB Consumer Privacy Litigation*, both of which are currently pending. These, and additional matters, are described below. She has also played leading roles in significant securities settlements, including Marsh & McLennan (\$400 million).

In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation

- MDL No. 2672
- Northern District of California, No. 3:15-md-02672

Total Settlements:

\$15 Billion

Background: This landmark case resolved claims against Volkswagen, Audi and Porsche in connection with the widely-reported news that the companies had installed emission systems created to avoid regulator detection and defraud customers who believed they were buying Volkswagen and Audi vehicles with “clean diesel” engines. VW admitted that it installed these “defeat devices,” which eliminated the emissions reduction during normal driving, and only allowed for reduced fuel emissions when the automobiles were being tested. More than 500 federal lawsuits were filed and consolidated into one complaint against the automaker for its “dirty diesel” vehicles.

BFA’s Role: Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs’ Steering Committee, which, along with lead counsel, has been described as the “dream team” prosecuting this high-profile emissions scandal. Judge Breyer selected Ms. Weaver from a field of 150 of the nation’s finest consumer litigation attorneys. Ms. Weaver’s leadership position in the case included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH’s significant role in multiple schemes to place software in vehicles purposefully designed to evade emissions laws. She also led the investigation into additional claims relating to defeat devices in certain gas vehicles, resulting in an additional \$96.5 million settlement for the Class.

Status: Lead Counsel and the Plaintiffs’ Steering Committee have achieved settlements for Plaintiffs worth approximately \$15 billion, the largest automotive class action recovery in history. This includes a \$14.7 billion settlement on behalf of eligible owners of Volkswagen and Audi 2.0-liter TDI cars, who were offered a buyback of



their cars. In accordance with the consent decree, \$2.7 billion of the settlement will be allocated to projects to reduce nitrogen oxides emissions, with a focus on improving air quality in areas that “bear a disproportionate share of the air pollution burden within their jurisdiction.” As the Justice Department’s top environmental attorney John Cruden has highlighted, this focus on remediation in low income and minority communities is “unique,” and a significant response to the disproportionate pollution burden felt by these communities.

On March 2, 2020, Judge Breyer granted final approval of a \$96.5 million settlement for more than 100,000 consumers who purchased or leased certain gasoline-powered Audi, Volkswagen, Porsche, and Bentley vehicles that were initially labeled and marketed with overstated fuel economy and understated carbon dioxide emissions.

Lead Counsel and the Plaintiffs’ Steering Committee continue to pursue claims against Defendants related to Porsche-branded gasoline vehicles.

In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability Litigation

- MDL No. 2777
- Northern District of California, No. 3:17-md-02777

Total Settlements:
\$307.5 Million

Background: The class alleges that Fiat Chrysler Automobiles deliberately cheated on emission testing of 2014-2016 model Dodge and Jeep trucks marketed and sold as environmentally friendly “eco-diesel” vehicles.

BFA’s Role: Judge Edward Chen of the U.S. District Court for the Northern District of California appointed Ms. Weaver as one of nine members of the Plaintiffs’ Steering Committee. Ms. Weaver played a key role in litigating the action, including taking depositions and coordinating with experts.

Result: The case has settled for \$307 million in cash in addition to extended warranties worth more than \$120 million.

In re Facebook, Inc. Consumer Privacy User Profile Litigation

- MDL No. 2843
- Northern District of California, No. 3:18-md-02843

Case Status:
Pending

Background: This high-profile case seeks redress for Facebook users in the U.S. whose private content was unlawfully shared with thousands of third parties. The detailed complaint documents Facebook’s violations of consumer fraud and privacy laws in allowing third party apps, including Cambridge Analytica, to bundle and sell Facebook users’ private information without their knowledge or consent.

BFA’s Role: In a contested and highly competitive field, Judge Chhabria of the



Northern District of California appointed Ms. Weaver as Co-Lead Counsel for Plaintiffs.

Status: In September 2019, Judge Chhabria largely denied Facebook's motion to dismiss, finding Facebook's argument that plaintiffs have no right to allege a breach of privacy based upon Facebook's sharing of their information with third parties "could not be more wrong." On March 10, 2020, the matter was assigned to Magistrate Judge Corley for the management of discovery. On October 29, 2020, Plaintiffs received a favorable ruling concerning the scope of discovery at issue in the MDL litigation. The order ruled that discoverable user data includes: 1) Data collected from a user's on-platform activity; 2) Data obtained from third parties regarding a user's off-platform activities; and 3) Data inferred from a user's on or off-platform activity. Discovery is ongoing.

[In re Google RTB Consumer Privacy Litigation](#)

- Northern District of California, No. 5:21-cv-02155

Case Status:

Pending

Background: The case is the first in the country to demand transparency about what information Google reveals about its users when it auctions ad placements to Google users through Google's "Real-Time Bidding" system.

BFA's Role: Ms. Weaver is a member of the Plaintiffs' Executive Committee.

Status: Plaintiffs filed a consolidated complaint on September 16, 2021 and motion to dismiss briefing is underway.

[In re: ZF-TRW Airbag Control Units Products Liability Litigation](#)

- Central District of California, No. 2:19-MD-02905

Case Status:

Pending

Background: The class action complaint alleges the ZF-TRW airbag and seat belt control units in over 15 million cars sold are defective and may prevent airbags from inflating in the event of crash. This defect has been linked to at least eight deaths and several serious injuries. The complaint names as defendants ZF-TRW, STMicro, and vehicle manufacturers, Kia, Hyundai, Hyundai MOBIS, Fiat Chrysler, Toyota, Honda, and Mitsubishi.

BFA's Role: Judge John A. Kronstadt of the Central District of California appointed Lesley Weaver to the Plaintiffs' Steering Committee for this multidistrict litigation.

Status: The parties have briefed motions to dismiss, to stay discovery, and to compel arbitration.



U.S. ANTITRUST LITIGATION HIGHLIGHTS

Lesley Weaver has been appointed to leadership positions in significant antitrust actions such as *In re Inductors Antitrust Litigation*. In addition, Lesley and her team play key roles in many additional matters, as described below.

In re Inductors Antitrust Litigation

- Northern District of California, No. 5:18-cv-00198

Case Status:
Pending

Background: Plaintiffs allege that Defendants, leading Japanese manufacturers of inductors such as Murata and Panasonic Corp., colluded to fix, inflate, or stabilize the price of inductors from at least 2003 until the summer of 2014, in violation of Section 1 of the Sherman Antitrust Act. Inductors are electronic components that work to regulate and store energy in a circuit and are found in thousands of products that rely on electronic circuits for power, such as computers, cars, and televisions. There is a criminal investigation by the Department of Justice pending.

BFA's Role: Judge Edward J. Davila of the Northern District of California appointed Lesley Weaver as Co-Lead Class Counsel, noting that “the efforts expended by BFA and Hausfeld to promptly identify and investigate the claims, coupled with the extensive amount of resources which they have available to expend on this case, renders them superior to represent the putative class.”

Status: The parties are briefing motions to dismiss.

In re Domestic Airlines Travel Antitrust Litigation

- District of Columbia, No. 1:15-mc-01404

Case Status:
\$60 million in partial
settlements;
Remaining litigation
pending

Background: Plaintiffs allege a conspiracy by the four largest commercial air passenger carriers in the United States—American Airlines, Inc., Delta Airlines, Inc., Southwest Airlines Co., and United Airlines, Inc.—to fix prices for domestic air passenger transportation services in violation of the Sherman Act by colluding to limit capacity on their respective airlines.

BFA's Role: BFA is a key part of Plaintiffs' nonparty discovery committee and has led meet and confer negotiations with dozens of nonparties, resulting in the production of some of Plaintiffs' best evidence.

Status: Plaintiffs have settled for \$15 million with Defendant Southwest Airlines and \$45 million with Defendant American Airlines. The parties are briefing motions for summary judgment brought by the remaining Defendants.



In re Local TV Advertising Antitrust Litigation

- MDL No. 2867
- Northern District of Illinois, No. 1:18-cv-0678

Case Status:

Agreements in principle
Pending

Background: Plaintiffs allege a price fixing cartel facilitated by an anticompetitive information exchange between and among certain major television station owners and operators to artificially inflate the prices of broadcast television spot advertisements.

BFA's Role: BFA acts as counsel for One Source Heating & Cooling, LLC and is an integral member of the litigation team.

Status: On November 6, 2020, Judge Virginia Kendall of the Eastern District of Illinois denied Defendants' motion to dismiss. Discovery in this matter is ongoing.

In re Disposable Contact Lens Antitrust Litigation

- MDL No. 2626
- Middle District of Florida, No. 3:15-md-02626

Case Status:

\$40 million in partial
settlements;
Remaining litigation
pending

Background: Plaintiffs allege claims for horizontal and vertical conspiracies in violation of state and federal antitrust laws due to unilateral pricing policies of four leading contact lens manufacturers.

BFA's Role: BFA is leading discovery efforts against the largest manufacturer, Johnson & Johnson.

Status: Plaintiffs have settled with Defendant CooperVision, Inc. for \$3 million and with Defendant Bausch & Lomb for \$10 million. Plaintiffs have also sought final approval of a proposed \$30.2 million settlement with ABB Optical Group LLC. Discovery in this matter is ongoing, and the parties await a trial date for claims against the remaining Defendants.

In re Mexican Government Bonds Antitrust

- Southern District of New York., No. 1:18-cv-02830

Case Status:

\$21 million in
settlements;
Remaining litigation
pending

Background: Plaintiffs allege that Defendant broker-dealers have fixed auctions for securities issued by the Mexican government and manipulated the bid-ask spread in transactions to U.S.-based investors, causing U.S.-based investors to pay artificially inflated prices for their Mexican government bonds.



BFA's Role: BFA represents Southeastern Pennsylvania Transit Authority and is assisting the team litigating the case in the Southern District of New York.

Status: Plaintiffs negotiated ice-breaker settlements with JPMorgan for \$15 million and Barclays PLC for \$5.7 million, totaling \$20.7 million in addition to cooperation in litigating against the remaining defendants, and filed a highly detailed complaint based in part on highly incriminating documents received from the cooperating defendants. The remaining Defendants' motion to dismiss is pending.

In re Farm-Raised Salmon and Salmon Products Litigation

- Southern District of Florida, No. 19-CV-21551

Case Status:
Pending

Background: Plaintiffs seek redress from Atlantic salmon producers who fixed prices of farm-raised Atlantic salmon sold in the United States, including Norwegian producers. Alleged conduct includes coordinating sales prices and exchanging commercially sensitive information, agreeing to purchase production from other competitors when those other competitors were selling at lower prices, and applying a coordinated strategy to increase spot prices in order to secure higher price levels for long term contracts. As a result, since 2015 farm-raised Atlantic salmon prices have been artificially inflated.

Role: BFA is working closely with the executive team facilitating jurisdictional discovery.

Status: On March 23, 2021, the Court denied Defendants' motion to dismiss, finding Plaintiffs have alleged a plausible conspiracy existed through circumstantial facts.

In re Packaged Seafood Products Antitrust Litigation

- MDL No. 2670
- Southern District of California, No. 3:15-md-02670

Case Status:
Pending

Background: Plaintiffs allege defendants entered into a conspiracy involving packaged seafood products in violation of the Sherman Act and state antitrust law.

BFA's Role: BFA is part of a critical discovery effort against a key defendant.

Status: On July 30, 2019, Judge Janis L. Sammartino of the Southern District of California granted class certification to a class of direct purchasers. In January 2021, Direct Purchaser Plaintiffs and Defendant Tri-Union Seafoods d/b/a Chicken of the Sea International and Thai Union Group PCL announced a settlement agreement in principle. The remaining parties have briefed motions for summary judgment.



* * *

BFA attorneys have also played key roles in other significant consumer protection litigation in recent history, helping consumers recover significant losses caused by misconduct in various industries across the marketplace. Select cases include:

In re Blood Plasma Antitrust Litigation, MDL No. 2109, No. 1:09-cv-07666 (N.D. Ill.)

Plaintiffs allege that Defendants participated in a multi-year conspiracy to restrict output and fix prices of Ig and Albumin in the United States. Ms. Weaver played a significant role, including deposing the Chief Operating Officer and Chief Marketing Officer of one of the main defendants.

In 2014, the Court granted final approval of the settlements between plaintiffs Defendants Baxter International, Inc., Baxter Healthcare, CSL Limited, CSL Behring LLC, CSL Plasma Inc., and the Plasma Protein Therapeutics Association, for a total settlement worth \$128 million.

In re Lithium Ion Batteries Antitrust Litigation, MDL No. 2420, No. 4:13-md-02420 (N.D. Cal.)

Plaintiffs allege that defendants and their co-conspirators engaged in an unlawful conspiracy to fix the prices of lithium ion battery cells, affecting the prices indirect purchasers paid for lithium ion batteries and lithium ion products. Indirect Purchaser Plaintiffs (IPPs) have settled their claims for \$19.5 million from Sony Corp., \$39 million from LG Chem Ltd., \$3.45 million from Hitachi Maxwell Ltd., and \$2.5 million from NEX Corp.

BFA represented the cities of Palo Alto and Richmond, California.

On October 27, 2017, the Court gave final approval to the settlement between the IPPs and Hitachi Maxell, NEC Corporation, and LG Chem. The settlement was worth \$45 million, bringing the total settlements with IPPs to \$64.5 million.



TEAM PROFILES

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Javier Bleichmar leads BFA's U.S. Case Evaluation and U.S. Securities Litigation teams. He brings a long career of litigation success to his prosecution of large-scale fraud class actions on behalf of investors. Javier has nearly two decades of experience and has been "recommended" in the field of securities litigation by *The Legal 500*.

Javier currently leads the BFA teams prosecuting class actions led by our clients against Teva Pharmaceutical Industries, Ltd., Citigroup, Inc., Granite Construction Incorporated, and Align Technology, Inc. Javier is also leading a securities action against Allianz Global Investors U.S., L.L.C. on behalf of the Metropolitan Transportation Authority.

Javier previously led the team litigating *In re MF Global Holdings Limited Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta and MF Global investors, in connection with the company's dramatic collapse on October 31, 2011. Judge Marrero in the Southern District of New York sustained the complaint in its entirety, and plaintiffs secured settlements totaling over \$234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Javier also led the team that prosecuted *Freedman v. Weatherford International Ltd., et al.*, on behalf of the Anchorage Police & Fire Retirement System. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately \$1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the parties announced a proposed \$120 million settlement on June 30, 2015.

Javier is also a successful appellate advocate, prevailing before the Eighth Circuit in *Public Pension Fund Group v. KV Pharmaceutical, Co.* The Eighth Circuit reversed an earlier dismissal and clarified the standard governing pharmaceutical companies' disclosures relating to FDA notifications.

Javier is active in educating international institutional investors on developing trends in the law, particularly the ability of international investors to participate in securities class actions outside the United States. Through these efforts, many of Javier's international clients were able to join the organization representing investors (i.e., the Foundation) in the first securities class action settlement under the then-recently



enacted Dutch statute against Royal Dutch Shell. He has co-authored articles concerning the developments in the class action landscape in Australia, and also provides thought leadership as a regular contributor on securities issues in the *New York Law Journal*. He has co-authored “IndyMac Leaves Uncertain Landscape for Opt-Out Litigation” and “The Evolving Legacy of *Fait v. Regions Financial*.” Javier is an active member of the National Association of Public Pension Plan Attorneys (NAPPA).

Prior to founding the firm, Javier was a Partner of Labaton Sucharow LLP. He also practiced at Bernstein Litowitz Berger & Grossmann LLP, where he was actively involved in the *In re Williams Securities Litigation*, which resulted in a \$311 million settlement, as well as significant securities matters involving Lucent Technologies, Inc., Conoco, Inc. and Biovail Corp. He began his legal career at Kirkland & Ellis LLP.

Javier earned a B.A. from the University of Pennsylvania and a J.D. from Columbia University School of Law (1998), where he was a Harlan Fiske Stone Scholar. During law school, he served as a law clerk to the Honorable Denny Chin, U.S. District Judge for the Southern District of New York. Javier is a native Spanish speaker and fluent in French.

Javier is admitted to practice in New York (1998), the U.S. Supreme Court (2010), and the U.S. Courts of Appeals for the Second Circuit (2010), Eighth Circuit (2010), Ninth Circuit (2010), Tenth Circuit (2013), and Eleventh Circuit (2011). He is also admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (1999).

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Joseph A. Fonti leads the Firm’s U.S. Securities Litigation team. He has nearly twenty years of experience in prosecuting complex litigations on behalf of institutional investors. His commitment to clients, advocacy skills, and litigation results have resulted in Joseph being “recommended” in the field of securities litigation by the Legal 500.

Joseph currently leads the BFA teams prosecuting class actions led by our clients against Teva Pharmaceutical Industries, Ltd. and Citigroup, Inc.

Joseph previously served as co-lead counsel in *In re Genworth Financial Inc. Securities Litigation* in the Eastern District of Virginia – widely known as the “rocket docket.” Joseph led the litigation to a remarkable recovery for the class in the amount of \$219 million, the largest securities class action recovery achieved in that jurisdiction. In defeating defendants’ motion to dismiss, Joseph secured one of the first pro-investor



opinions after the Supreme Court's recent decision in the Omnicare matter. Joseph already had notable success in the high-pressure environment of this Virginia district court. In 2013, as lead trial lawyer on behalf of shareholders of Computer Science Corp., after prevailing at class certification and only four weeks before trial, Joseph and his team secured a \$97.5 million settlement – which was at that time the second-largest cash securities settlement in the court's history.

Joseph also contributed to the prosecution and ultimate resolution of the *Weatherford* securities litigation (*Freedman v. Weatherford International Ltd., et al.*). Joseph's contribution to this very intense litigation centered on complex accounting and expert matters, and he took trial testimony of several third-party accountants and consultants who were not expected to appear for trial. Joseph, as part of the team led by partner Javier Bleichmar, contributed to an outstanding recovery of \$120 million for Weatherford shareholders.

With over a dozen years of experience in investor litigation, Joseph's career is also marked by significant successes in the area of auditor liability and stock options backdating. For example, he represented shareholders in the \$671 million recovery in *In re HealthSouth Securities Litigation*. Particularly, Joseph played a significant role in recovering \$109 million from HealthSouth's outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm. He also contributed to securing a \$173.5 million settlement in *In re Broadcom Corp. Securities Litigation*, which, at the time, was the second-largest cash settlement involving a company accused of options backdating. This was the only such case in which claims against the auditors were sustained.

In addition to representing several of the most significant U.S. institutional investors, Joseph has represented a number of Canada's most significant pension systems and asset managers. He also provides thought leadership on issues of particular relevance to these clients. For example, he co-authored "Cross-Listed Securities Cases Present Challenges," for the *National Law Journal*, (May 30, 2016), which addresses recent *Morrison* interpretations in light of modern financial markets. He also led the prosecution of *In re NovaGold Resources Inc. Securities Litigation*, which resulted in the largest settlement under Canada's securities class action laws.

Additionally, Joseph has achieved notable success as an appellate advocate. He successfully argued before the Second Circuit Court of Appeals in *In re Celestica Inc. Securities Litigation*. The Second Circuit reversed an earlier dismissal and turned the tide of recent decisions by realigning pleading standards in favor of investors. Joseph was also instrumental in the advocacy before the Ninth Circuit Court of Appeals in the *In re Broadcom Corp. Securities Litigation*. This appellate victory marked the first occasion a court sustained allegations against an outside auditor related to options backdating.



Prior to founding the firm, Joseph was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, and began his legal career at Sullivan & Cromwell LLP, where he represented Fortune 100 corporations and financial institutions in complex securities litigation, in multifaceted SEC investigations, and at trial.

Joseph is a member of the ABA, the NY State Bar Association, the Bar of the City of New York, and the National Association of Public Pension Attorneys (NAPPA).

Joseph earned a B.A., *cum laude*, from New York University and a J.D. from New York University School of Law (1999), where he was a member of the Marden Moot Court. He is admitted to practice in New York (2000), the U.S. Supreme Court (2007), and the U.S. Courts of Appeals for the Second Circuit (2010), Ninth Circuit (2007), and Tenth Circuit (2013). He also is admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (2001).

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Dominic J. Auld leads BFA's Non-U.S. Litigation team. He has more than a decade of experience in representing and advising institutional clients in large-scale securities and investment-related lawsuits. Dominic has been named a "Super Lawyer" in the field of securities litigation by *Super Lawyer* awards and has been "recommended" in the field of securities litigation by *The Legal 500*.

Dominic is responsible for BFA's outreach to pension systems, asset managers, and sovereign wealth funds outside the United States – regularly advising clients in Europe, Australia, Asia, and across his home country of Canada.

Dominic and his team have served as liaison counsel to global investors in many shareholder and investor litigations outside the United States, including class and collective actions against Olympus Corp. (Japan); OZ Minerals Ltd. (Australia); Fortis (Belgium and the Netherlands); Vivendi Universal (France); Volkswagen AG (Germany); and many other companies.

Dominic is sought after as a commentator on topics such as corporate governance, shareholder activism, fiduciary duty, corporate misconduct, and international class and collective litigation. He has been a regular speaker and panelist at law and investment conferences, including past events such as the Canadian Foundation for Advancement of Investor Rights (FAIR Canada) and Osgoode Hall Law School conference on public and private securities enforcement and investor recovery in Toronto, the IMF Bentham shareholder class action conference in Sydney, and the Annual International Bar Association meeting in Dubai.



Dominic is the author of various articles of interest to the Firm's client base, including an analysis of shareholder remedies in Japan in *Law360*, and a piece regarding custodian bank fees and their impact on pension funds globally in *Nordic Regions Pensions and Investment News* magazine. He is quoted in publications including *The Economist*, *The Financial Times*, *The New York Times*, *USA Today*, *The Times of London*, *The Evening Standard*, *The Guardian*, and *The Daily Mail*, and trade publications such as *Global Pensions*, *OP Risk and Regulation*, *The Lawyer*, *Investments and Pensions Europe*, *Professional Pensions*, and *Benefits Canada*. He also was interviewed by *Corporate Counsel* for a feature article on rogue trading.

Prior to founding the Firm, Dominic was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, where he began his career as a member of the team responsible for prosecuting the landmark action *In re WorldCom Inc. Securities Litigation*, which resulted in a settlement of more than \$6 billion.

Dominic has years of experience working directly with institutional clients affected by securities fraud. For example, he worked extensively with the Ontario Teachers' Pension Plan Board as it led securities actions *In re Nortel Networks Corp. Securities Litigation*, *In re Williams Securities Litigation*, and *In re Biovail Corp. Securities Litigation* – cases that recovered a total of more than \$1.7 billion for investors.

Dominic earned a B.A. from Queen's University in Canada and a J.D. from Lewis and Clark Law School (1998). He is admitted to practice in New York (1998), and in the U.S. District Courts for the Southern and Eastern Districts of New York (2011).

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In her twenty-five year career, Lesley has focused primarily on cases that protect the public interest, consumers, and public entities. She continues to do so as the Head of BFA's Antitrust and Consumer Litigation Teams, and as the Partner in Charge of BFA's California Office. In 2015, Lesley was appointed by U.S. District Judge Charles R. Breyer to the Plaintiffs' Steering Committee in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litig.*, MDL No. 2672 CRB (JSC). The PSC in the Volkswagen litigation recovered \$14.7 billion for class members and nearly \$5 billion for the environment, the largest automotive class action recovery ever.

In July 2018, Judge Chhabria of the Northern District of California appointed Lesley as co-lead counsel for plaintiffs in *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*. The litigation consolidates more than 30 cases filed around the country alleging that Facebook violated consumer fraud and privacy laws in allowing



hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' personally identifiable information without their knowledge or consent.

In April 2018, Lesley was appointed as interim Co-Lead Counsel in *In re Inductors Antitrust Litig.*, Case No. 18-cv-198, representing a class of purchasers of inductors, a passive electronic component that is a key element of electronic circuits found in smart phones, laptops, computers, and other consumer electronic devices.

In June 2017, Lesley was appointed to the Plaintiffs' Steering Committee leading claims against Fiat Chrysler and Bosch in *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability*, MDL No. 17-MD-02777-EMC ("Fiat Chrysler"). Like Volkswagen, the Fiat Chrysler lawsuit seeks to redress harm to consumers arising out of the illegal and deliberate use of devices to sense when vehicles are being tested, so that those vehicles regularly emit significant amounts of pollution on the road.

In pro bono matters, including negotiating reforms in the merger between SunTrust and BBC banks, Lesley represents the National Black Farmers Association, an organization dedicated to securing better economic conditions for farmers with deep historical roots in our country's economic success.

In addition, Lesley has extensive experience representing sophisticated institutional investors in landmark securities actions. Some of those cases include *In re Cavanaugh Securities Litig.* (including an appeal to the Ninth Circuit concerning the method of selecting lead plaintiff and lead counsel after the enactment of the Private Securities Litigation Reform Act.); *In re Marsh & McLennan Cos. Sec. Litig.* (\$400 million settlement); *In re Cardinal Health Inc. Sec. Litig.* (\$600 million settlement); *In re Cisco Systems, Inc. Sec. Litig.* (\$99 million settlement); *In re Northpoint Communications Group, Inc.* (notable decision finding that certain allegations of scienter and falsity in securities suit were pled with particularity required by PSLRA and statements made about potential merger with Verizon were deliberately reckless); and *CommTouch Software, Ltd. Sec. Litig.* (notable decision finding complaint pled with sufficient particularity to support an inference of deliberate misconduct), among other significant cases.

In addition, Lesley counsels clients seeking to opt out of class action litigation, assisting them in negotiating confidential, private settlements with outstanding results.

In October 2014, Lesley tried an internet privacy case against a Chinese-owned,



California-based internet site, recovering 100 percent of economic damages and a \$15 million punitive damages jury verdict, as well as significant injunctive relief. Her first trial was in 1998 before the Hon. Vaughn Walker on behalf of Amanda Buritica, a U.S. citizen born in Colombia who was unlawfully detained by U.S. Customs at San Francisco International Airport. The case resulted in the largest verdict at the time under the Federal Tort Claims Act.

Lesley is committed to public service through volunteer efforts, and currently serves on the Advisory Council of the East Bay Community Law Center, as well as the Executive Committee of the Securities Section for the Bar Association of San Francisco. She is a past Co-Chair of Bay Area Lawyers for Individual Freedom, a past Co-Chair of the San Francisco LGBT Community Center, past National Chair of the National Center for Lesbian Rights, and past Vice-President and Director of the Board of the Frameline Film Festival. She has previously served on the boards of Women Lawyers of Alameda County, Equality California, the International Gay and Lesbian Human Rights Commission, and the Alice B. Toklas Democratic Club. She also is a member of Public Justice and of the National Association of Public Pension Attorneys (NAPPA).

Lesley holds degrees from the University of Virginia and Harvard College. She studied political science at the University of Bonn (Germany), and attended high school at Haderslev Katedraleskole in Denmark. She speaks German and Danish.

Lesley is admitted to practice in California (1997), the U.S. Court of Appeals for the Ninth Circuit (1998), and the U.S. District Courts for the Northern District (1997) and the Eastern, Central, and Southern Districts of California (1998).

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Peter Borkon is a partner and Co-Director of Institutional Investor Relations at BFA. Over his twenty-five year career, Peter has prosecuted many complex civil cases including large-scale securities fraud class actions on behalf of institutional and individual investors. In addition to his litigation successes, he maintains a counseling practice on issues of financial fraud and fiduciary law.

Peter is currently a lead partner prosecuting the class action led by our institutional investor client against Granite Construction Incorporated. The Northern District of California recently granted preliminary approval of the \$129 million settlement, one of the largest securities fraud settlements before that Court.



Peter is also litigating an action against certain members of the current and former board of directors of Tesla on behalf of the Police & Fire Retirement System of City of Detroit, and is pursuing confidential derivative actions on behalf of additional institutional clients.

Over his career, Peter has also played a pivotal role seeking corporate governance reforms. In the McKesson Corporation derivative case, he sought reforms related to McKesson's participation in the nationwide opioid crisis. He co-drafted the complaint that in May of 2018 Northern District of California Judge Claudia Wilken upheld as demonstrating that any demand the board take action to rectify the alleged wrongdoing would be futile. Peter's other high-profile corporate governance cases include serving as a lead team member in the Pacific Gas & Electric (San Bruno Explosion) case, which resulted in a significant payment to the corporation and cutting edge corporate governance reforms for the board of directors and operations at the gas operating company.

Peter's career as an advocate also includes litigating securities class action cases like *In re Homestore.com Securities Litigation* on behalf of the California State Teachers Retirement System and Homestore.com investors, in connection with the company's 2001 financial fraud. After multiple rounds of motions to dismiss and summary judgment, Judge Pechman, sitting by designation in the Central District of California, approved settlements totaling over \$100 million, to resolve claims against Homestore.com and its auditor PWC.

Peter also had a key role in prosecuting *In re Charles Schwab YieldPlus Fund Securities Litigation* on behalf of fund investors. The case alleged that Charles Schwab Corporation and the fund's underwriters deceived investors about the underlying risk in the fund, which was sold as a cash alternative, but in fact was deeply invested in highly speculative and risky mortgage-related structured debt, according to the complaint. After three years of intense litigation, including dozens of depositions, motions for summary judgment and contentious negotiations during which Schwab changed counsel, the parties announced a \$235 million settlement. Peter was also the lead lawyer in *Nallagonda v. Osiris Therapeutics, Inc.*, spearheading an investigation and prosecution that resulted in a 2018 settlement that is valued between 36% and 86% recovery of losses for defrauded investors.

Peter also has decades of experience serving institutional investors as an advisor. He developed his prior firm's Portfolio Monitoring and Case Evaluation practice. He regularly provides institutional investor clients with educational programs and brings his years of teaching experience to every advisory engagement. Peter speaks on issues of importance to institutional investors like corporate governance, ethics, fiduciary duty, open records acts, Environmental Social and Governance (ESG)



investment and the intersection of those principles with federal and state securities laws.

Peter's broad involvement in public service through volunteer enterprises includes his current service on the San Francisco AIDS Foundation's Board of Directors where he is a member of that Board's Audit Committee. He is a past Co-Chair of the AIDS Legal Referral Panel's Board of Directors and a past Co-Chair of the Bay Area Lawyers for Individual Freedom's Judicial Nominations and Endorsements Committee. He also is a member and frequently speaks at conferences of the National Association of Public Pension Attorneys (NAPPA) and the National Conference on Public Employee Retirement Systems (NCPERS). Peter was recently elected to the Council of Institutional Investors' Markets Advisory Council to provide input on legal, financial reporting and investment market trends.

Peter is a certified Mediator for the Northern District of California's ADR program. He is serving his third term as a Director at the Northern District of California's Federal Practice Program Board, an At-Large Member of the Ninth Circuit's Circuit Executive Committee and a past Co-Chair of the Lawyer Representatives of the Northern District of California to the Ninth Circuit Judicial Conference (2017).

Peter is admitted to practice in Illinois (1996) and California (2001), the U.S. Supreme Court (2003), the U.S. Court of Appeals for the Ninth Circuit (2001) and Third Circuit (2017), and the U.S. District Courts for the Northern District of California (2001), the Central District of California (2001), the Northern District of Illinois (2009), the District of Colorado (2003), the Eastern District of Wisconsin (2003), and the Western District of Wisconsin (2003).

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Nancy Kulesa has extensive experience in complex litigation in federal and state courts, including securities litigation, Employee Retirement Income Security Act of 1974 (ERISA) litigation, consumer fraud litigation, mergers and acquisitions cases, and antitrust litigation.

Nancy represents public pension funds, Taft-Hartley funds, and other institutional investors in securities class actions and derivative litigation. She has nearly two decades of experience assisting clients in identifying material losses in their securities portfolios caused by corporate wrongdoing. Nancy consults with institutional investors to help them monitor litigation and to evaluate opportunities for recovery.

Nancy is currently litigating the class action against Align Technology Inc. on behalf of Court-appointed Lead Plaintiff Macomb County Employee's Retirement System.



Nancy is also litigating an action against certain members of the current and former board of directors of Tesla on behalf of the Police & Fire Retirement System of City of Detroit, and is pursuing confidential derivative actions on behalf of additional institutional clients. Nancy has previously been counsel in numerous high-profile securities fraud litigations that have recovered hundreds of millions of dollars for shareholders including:

- *In re CIT Group Securities Litigation*, 1:08-06613 (S.D.N.Y.) (\$75 million)
- *Klugmann v. American Capital Ltd.*, 09-cv-0005 (D. Md.) (\$18 million)
- *In re Nuvelo, Inc. Securities Litigation*, 07-cv-4056 (N.D. Cal.) (\$8.9 million)
- *Bauer v. Prudential, Inc.*, 09-cv-1120 (JLL) (D. NJ) (\$16.5 million)
- *Carlson v. Xerox Corporation*, 3:00CV01621 (ATW) (D Conn) (\$750 million)
- *Fragala v. 500.com Ltd.*, 2:15-cv-01463-MMM (C.D. Cal.) (\$2.5 million)

Nancy represented a Taft-Hartley Fund in the historic settlement with Twenty-First Century Fox, Inc. regarding allegations surrounding workplace harassment incidents at Fox News, which resulted in a \$90 million derivative settlement and wide-ranging corporate governance reforms at the company.

Nancy has also represented consumers in complex, class action litigation involving false advertising and defective product claims, including serving as court-appointed Lead Counsel in *Logan Landes, et al. v. Sony Mobile Communications, et al.*, 17-cv-02264-JFB-SIL (EDNY), which resulted in settlement relief to consumers valued at over \$6 million. In that litigation, the Honorable Joseph F. Bianco recognized the high quality of her work, “The quality of the representation, as I noted, has been extremely high, not just in terms of the favorable outcome in terms of the substance of the settlement, but in terms of the diligence and the hard work that has gone into producing that outcome.”

Prior to joining BFA, Nancy was a partner at a well-established national securities litigation firm where she represented investors in securities class actions, and created and directed the firm’s Portfolio Monitoring Services practice. Nancy has experience in representing corporations seeking antitrust clearance of mergers and acquisitions and has also handled commercial litigation matters and contractual disputes.

Nancy frequently speaks on topics related to securities litigation and investor rights at educational forums for public pension funds and Taft-Hartley funds.

She is a member of the National Conference on Public Employee Retirement Systems (NCPERS), International Foundation of Employee Benefit Plans (IFEBP), Texas Association of Public Employee Retirement Systems (TEXPERS), Florida Public Pensions Trustees Association (FPPTA), Michigan Association of Public Employee



Retirement Systems (MAPERS) and Illinois Public Pension Fund Association (IPFFA). Nancy serves as an Officer to the National Association of Shareholder & Consumer Attorneys (NASCAT) as Treasurer.

Nancy was recognized by Lawdragon as a Leading Plaintiff Financial Lawyer.

Nancy earned a B.A. in International Politics from Fordham University in 1998 and a J.D. from the University of Connecticut School of Law in 2001.

Nancy is admitted to practice in Connecticut (2001), the United States District Court for the District of Connecticut (2004), the United States District Court for the Southern District of New York (2015), and the United States Court of Appeals for the Ninth Circuit (2016).

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As Co-Director of Institutional Investor Relations and the head of BFA's Claims Filing Team, Erin's practice combines her vast experience advising institutional investors on current and potential securities litigation and advising clients in recovering investment losses through filing settlement claims.

With more than twelve years in the class action industry, Erin brings a unique blend of years of litigation experience, a decade of representation of institutional investors, and extensive expertise in the claims administration process. Erin is currently a member of the team prosecuting the securities class action against Citigroup, Inc. She also leads institutional investor outreach and advises pension funds and other entities on lawsuits concerning violations of U.S. and non-U.S. securities and investment laws, antitrust and consumer laws, and securities class action settlements.

Prior to joining BFA, Erin was a Director at an industry-leading claims administration firm, where she provided plaintiffs' and defense counsel comprehensive, accurate, and practical approaches to class action and mass tort settlement administration.

While working with BFA's founding partners as an associate at their prior firm, Erin litigated securities class actions such as *In re Celestica Inc. Securities Litigation* and *In re NovaGold Resources Inc. Securities Litigation*, which resulted in a cross-border settlement that was at the time the largest settlement under Canada's securities class action laws, and two related cases against OppenheimerFunds Inc. that resulted in a \$100 million settlement.

Erin is a member of the National Association of Public Pension Attorneys (NAPPA), National Conference of Public Employee Retirement Systems (NCPERS), National



Council on Teacher Retirement (NCTR), National Association of State Retirement Administrators (NASRA), State Association of County Retirement Systems (SACRS), California Association of Public Retirement Systems (CALAPRS), and a number of additional organizations.

Erin earned a B.A. from Villanova University in 2004 and a J.D. from Brooklyn Law School in 2008. She is admitted to practice in New York (2009), the U.S. Courts of Appeals for the Ninth Circuit (2010) and Second Circuit (2011), and the U.S. District Court for the Southern District of New York (2009).

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Matthew Melamed joined the firm in 2021, focusing on prosecuting complex consumer and antitrust matters.

Before joining the firm, Matt was a partner at Robbins Geller Rudman & Dowd LLP, where he represented cities, counties, and states in nationwide litigation concerning the marketing, distribution, and dispensing of prescription opioids. Among other roles in those cases, he represented the City and County of San Francisco, whose case was remanded as an MDL bellwether from *In re: National Opiate Litigation*. Matt also litigated numerous securities fraud lawsuits, including *Jones v. Pfizer Inc.*, *In re St. Jude Medical, Inc. Securities Litigation*, and *Villella v. Chemical & Mining Company of Chile, Inc.* He was a member of case teams that recovered more than \$1.2 billion.

Matt was previously a law clerk for the Honorable Joseph A. Greenaway, Jr. on both the United States District Court for the District of New Jersey and the United States Court of Appeals for the Third Circuit. He was also the Kazan-Wallace Attorney at Public Justice PC. During law school, Matt was an extern for the Honorable Susan Y. Illston, United States District Court for the Northern District of California.

Matt is admitted to practice in California (2008), the United States Courts of Appeals for the Third (2010) and Tenth (2009) Circuits, and the United States District Courts for the Northern (2010) and Central (2012) Districts of California.

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Anne Davis joined BFA in 2018. She has a decade of experience litigating complex matters in both federal and state courts, including the courts of California, Delaware, and Kansas. She focuses her practice on complex investigations and litigation of antitrust, consumer, and securities matters.



Anne plays a key role in litigating *In re: Facebook, Inc. Consumer Privacy User Profile Litigation* and *In re Inductors Antitrust Litigation*; she is also a member of the BFA teams litigating *In re German Automotive Manufacturers Antitrust Litigation* and *In re Domestic Airlines Travel Antitrust Litigation*. She recently co-authored *That's The Ticket - Game On For Plaintiffs Challenging Suppression of the Market For Football Broadcasts* for the September edition of the Antitrust, UCL and Privacy Section E-Brief for California Lawyer's Association, and *The Interplay of the European Union's General Data Protection Regulation and U.S. E-Discovery—One Year Later, the View Remains the Same*, which was published in the Spring 2019 edition of Competition.

Prior to joining BFA, Anne served as a Principal Counsel for Sales Practice Enforcement at the Financial Industry Regulatory (FINRA), where she, as appropriate, brought charges and negotiated resolutions or litigated formal actions pertaining to violations of FINRA, U.S. Securities and Exchange Commission (SEC), and Municipal Securities Rulemaking Board (MSRB) rules, and the federal securities laws by registered individuals and FINRA member firms.

Before FINRA, she was a senior associate at Morrison & Foerster, LLP, where she specialized in securities litigation and enforcement, complex civil litigation, and internal investigations. She also maintained a pro bono practice involving Title IX compliance in California public schools, litigation on behalf of prisoners asserting Section 1983 excessive force claims, and asylum claims.

Anne earned a B.A. with honors from DePaul University (2002), a M.A. (Political Science) from the University of Michigan (2006), and a J.D. from the University of Michigan Law School (2008). She is admitted to practice in California (2009), and the U.S. District Courts for the Northern (2010), Central (2011) and Eastern (2014) Districts of California and the Eastern District of Michigan (2019).

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Evan Kubota brings substantial experience in all stages of litigation, from pre-suit investigation and strategic advice through motion practice, discovery, trial, and appeal. His experience includes complex securities and derivative actions, bankruptcy confirmation and adversary proceedings, and regulatory investigations. He has taken and defended numerous depositions, worked closely with damages and industry experts, and participated in several trials.

Evan is currently a member of the team prosecuting the cases against Teva Pharmaceutical Industries, Ltd. and Granite Construction Incorporated.



Prior to joining BFA in 2019, Evan was an associate at Paul, Weiss, Rifkind, Wharton & Garrison LLP for nine years, where he litigated high-profile matters on behalf of financial institutions and issuers in a variety of industries. Representative matters include plaintiff's counsel in breach of contract, fraud and civil RICO litigations against a distressed insurance company; debtor's counsel in a leading media company's Chapter 11 bankruptcy, which eliminated over \$1 billion in debt; and the defense of numerous RMBS-related litigations, arbitrations, and investigations in the wake of the financial crisis.

Evan earned a B.A. from the University of Florida, *cum laude*, in 2007 and a J.D. from Harvard Law School, *cum laude*, in 2010. He is admitted to practice in New York (2011), as well as the U.S. District Courts for the Southern and Eastern Districts of New York (2011).

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For over a decade, Ross has been advising many of the world's largest and most sophisticated institutional investors concerning their rights and potential legal claims arising out of securities-related matters. He is a senior member of the firm's Client Monitoring and Case Evaluation Group in which he, together with a team of attorneys and financial analysts, develops and recommends legal strategies to the firm's clients.

Ross is also one of the lead attorneys litigating the securities class action against Granite Construction Incorporated, which the court sustained over defendants' motion to dismiss and recently certified as a class action. Ross is also one of the lead attorneys representing investors in the securities class actions concerning Citigroup Inc. and Align Technology, Inc. For his success representing investors, Ross has consistently been named by Super Lawyers as a New York "Rising Star" in the area of securities litigation.

Prior to joining the firm, Ross was an associate at Bernstein Litowitz Berger & Grossmann LLP where he was a senior member of its New Matter Department. Ross was also an instrumental member of the litigation teams responsible for recovering hundreds of millions of dollars on behalf of injured investors that were misled when purchasing residential mortgage-backed securities. He also served as a member of the litigation team prosecuting the securities fraud class action against Volkswagen, which resulted in a recovery of \$48 million for investors in Volkswagen American Depository Receipts. Ross also served as a member of the team litigating the securities class action concerning GT Advanced Technologies, which has resulted in \$36.7 million in recoveries to-date.



Ross earned a B.A., *cum laude*, from Skidmore College, and an M.A. from Indiana University-Bloomington. He earned a J.D., *cum laude*, from Brooklyn Law School (2010) where he worked as a research assistant to Brooklyn Law School Professor of Law Emeritus Norman Poser, a widely respected expert in international and domestic securities regulation. He also served as a judicial intern to the Honorable Brian M. Cogan of the Eastern District of New York, a legal intern for the Major Narcotics Investigations Bureau of the Kings County District Attorney's Office, and a summer associate at a prominent defense firm.

Ross is admitted to practice in New York (2011), as well as the U.S. District Courts for the Southern District of New York (2011) and the Eastern District of New York (2011).

KENDRA SCHRAMM
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Kendra Schramm is a highly valued litigator with over ten years of experience prosecuting complex securities class actions. Kendra is a key member of the Firm's Non-U.S. Litigation and Claims Filing teams. She also assists the Client Reporting and Data Analysis team in assessing clients' loss exposure in both domestic and international matters.

Kendra acts as liaison counsel to institutional investors in securities and investment-related actions across the globe – including in Australia, Europe, and Japan. She provides highly pragmatic advice to sophisticated clients on the risks of participation in these cases, which often require a formal decision to pursue a claim. She is instrumental to BFA's outreach to institutional clients outside the United States. In addition, Kendra recently co-authored "A Look at Shareholder Remedies in Japan" in *Law360*, commenting on the evolving Japanese litigation regime.

Prior to joining the Firm, Kendra was an associate at Labaton Sucharow LLP, where she was a member of the team that recovered more than \$1 billion in total settlements in the landmark securities class action against American International Group and numerous related defendants. She also was instrumental in prosecuting the complex securities litigation against the Federal National Mortgage Association (Fannie Mae), which successfully alleged that investors' losses were caused by the defendants' misstatements and misconduct, rather than the recent financial crisis, and recovered \$170 million.

Kendra earned a B.A. from New York University and a J.D. from Brooklyn Law School (2011), where she was an Associate Managing Editor of the *Journal of Law & Policy*. During law school, she served as a law clerk to the Honorable Elizabeth S. Stoner, U.S. Bankruptcy Court Judge for the Eastern District of New York. She is admitted to practice in New York (2012), New Jersey (2012), the U.S. Supreme Court (2014), and



the U.S. District Courts for the Southern District of New York (2012) and the District of New Jersey (2012).

SARA PILDIS SIMNOWITZ
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Sara Pildis Simnowitz is Special Counsel at BFA, prosecuting a variety of complex litigations.

Sara has nearly twenty years of experience in all aspects of litigating complex matters. Sara is dedicated to prosecuting securities, antitrust, and consumer fraud class actions on behalf of institutional, municipal, and individual clients. Sara draws on her extensive litigation experience while playing a key role in prosecuting the Firm's antitrust and consumer cases, including *In re Inductors Antitrust Litigation* and *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*.

Sara is also a central member of the team prosecuting *Ontario Teachers' Pension Plan Board, et al. v. Teva Pharmaceutical Industries Ltd. et al.*, and prosecuted *In re Genworth Financial Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta in the Eastern District of Virginia.

Before joining BFA, Sara was a senior associate at Arnold & Porter LLP, where she focused on complex commercial litigation. She previously practiced at Heller Ehrman LLP in New York and Foley Hoag LLP in Massachusetts, where she focused on complex commercial and securities litigation.

Sara earned a B.A., *summa cum laude*, from Brandeis University, a J.D. from the University of Chicago Law School (2001), and an M.A. from the London School of Economics and Political Science (2002). She is admitted to practice in Massachusetts (2002), New York (2006), the U.S. Supreme Court (2008), the U.S. Court of Appeals for the First Circuit (2003), and the U.S. District Courts for the District of Massachusetts (2002), the Southern and Eastern Districts of New York (2006), and the Western District of New York (2008).

GEORGE BAUER
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For almost nine years, George has taken a lead role in all stages of complex civil litigation, from pre-suit investigation through motion practice, discovery, summary judgment, and trial.



George is currently a member of the teams prosecuting cases against Granite Construction Incorporated and Allianz Global Investors U.S., L.L.C.

While an associate and later junior partner at the international law firm of Kirkland & Ellis LLP, George gained experience taking and defending depositions, working with expert consultants and witnesses, and appearing in court. In addition, George has handled numerous internal investigations and investigations by both the U.S. Department of Justice and the U.S. Securities and Exchange Commission. George has represented clients in connection with complex regulatory enforcement matters dealing with, among other things, securities fraud, commodities fraud, and foreign bribery issues. He has also advised transactional teams on litigation and compliance related risks.

Prior to Kirkland, George attended Brooklyn Law School where he served as a student prosecutor in the Kings County District Attorney's office and led the prosecution of misdemeanor domestic violence cases. He also interned at the New York City Police Department, the U.S. Attorney's Office for the Eastern District of New York, the Federal Trade Commission, and the New York Attorney General's Office.

George earned a B.A. from the University of Massachusetts at Amherst, *cum laude*, in 2008 and a J.D. from Brooklyn Law School, *magna cum laude*, in 2011. He is admitted to practice in New York (2012), the Eastern District of New York (2013), and the Southern District of New York (2014).

ANGELICA ORNELAS
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Angelica Ornelas has substantial experience litigating class actions and other complex matters in federal courts across the country.

Angelica is a key member of the teams litigating *Calhoun et al. v. Google LLC, In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, and *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*.

Prior to joining BFA, Angelica was an associate at Girard Sharp, where she specialized in consumer protection and financial products litigation. While at Girard Sharp, Angelica served as co-class counsel in *Prather v. Wells Fargo Bank, N.A.*, representing individuals who received illegal automated calls or text messages from the bank. Angelica was also a member of the litigation team in *Daccache v. Raymond James Financial, Inc.*, brought on behalf of victims of the Jay Peak investment fraud—the largest in the history of the EB-5 visa program—and *Larson v. John Hancock Life Insurance Company (U.S.A.)*, a certified class action alleging that John Hancock



improperly inflated cost of insurance charges deducted from its customers' life insurance policies.

Before Girard Sharp, Angelica was a Fellow at the California Monitor Program, a program of the California Attorney General, where she worked closely with Congresswoman Katie Porter to ensure that the nation's five largest mortgage servicers delivered the relief Senator Kamala Harris negotiated for Californians as part of the landmark \$25 billion National Mortgage Settlement.

Angelica is an active member of the Sedona Conference, Working Group 1 on Electronic Document Retention and Production. She recently presented at the California Employment Lawyers Association's Electronic Discovery Seminar on topics involving collection and production of electronically stored information and advanced search methodologies. Angelica is also a member of the Federal Bar Association and a Mentor for Centro Legal de la Raza's Youth Law Academy. She has been selected as a Northern California Rising Star every year since 2017 and was named to the National Trial Lawyer's Top 40 Under 40 List in 2020 and 2021.

Angelica earned an undergraduate degree from UC Los Angeles and completed a master's program at San José State University before receiving her law degree from UC Berkeley. After law school, she clerked in the United States District Court for the Northern District of California and the United States Bankruptcy Court for the District of Nevada. She is admitted to practice in California (2012), the U.S. Court of Appeal for the Ninth Circuit (2019) and the U.S. District Courts of the Northern District of California (2016), the Central District of California (2017), and the Northern District of Illinois (2019).

BENJAMIN F. BURRY
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Benjamin Burry has substantial experience representing clients in a broad range of complex commercial and statutory litigation matters, including in contract and investment disputes, intellectual property disputes, actions involving a wide array of business torts, fraud, breach of fiduciary duty, securities class actions, shareholder derivative litigation, bankruptcy litigation, and cases involving the Federal Arbitration Act. He has represented clients in federal and state courts throughout the United States, including bankruptcy court, as well as arbitration forums, private mediation, and in enforcement proceedings.

At BFA, Benjamin is a member of the teams prosecuting cases against Teva Pharmaceutical Industries, Ltd., Granite Construction, Inc, and Citigroup.



Benjamin also maintains an active pro bono practice, including representing New York City parks and community gardens in civil litigation as well as in corporate governance issues, land rights, local law and regulations, licensing and leases.

Prior to joining BFA, Benjamin was a senior associate at Sidley Austin LLP, where he was a member of the firm's securities and shareholder litigation, commercial litigation and disputes, and Supreme Court and appellate practices.

Benjamin earned a B.A., *magna cum laude*, from Illinois Wesleyan University in 2007 and a J.D. from the University of Chicago Law School in 2010. Benjamin is admitted to practice in the U.S. Court of Appeals for the Second Circuit (2014) and the U.S. District Courts for the Southern and Eastern Districts of New York (2013). After earning his law degree, Benjamin served as law clerk to the Honorable Susan P. Read of the New York Court of Appeals.

THAYNE STODDARD
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Thayne Stoddard has extensive experience in all aspects of litigation, including investigating and drafting claims, briefing dispositive and other motions, coordinating discovery efforts and leading discovery teams, and preparing for and conducting trial.

At BFA, Thayne primarily prosecutes complex securities fraud cases on behalf of institutional investors, and is a member of the teams prosecuting cases against Teva Pharmaceutical Industries, Ltd. and Citigroup, Inc.

Prior to joining BFA, Thayne was an associate at Kirkland & Ellis LLP for over three years and represented clients in numerous securities class action, complex commercial, shareholder, and bankruptcy cases.

Thayne earned a B.A. from Yale University in 2011, a J.D. from Duke University School of Law in 2014, and a M.A. from Duke University in 2014. Thayne is admitted to practice in New York (2015) and the U.S. District Court for the Southern District of New York (2016).


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Nicholas Dennany focuses his practice on investigating and analyzing pending and potential securities fraud and derivative claims and assists the Firm in advising and recommending strategies to its clients to ensure that their rights are protected. Nick is also a member of the Firm's litigation team and has more than a decade of litigation experience, with specific expertise in discovery matters and managing large-scale electronic document reviews.

Nick was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. BFA recovered \$219 million for investors – the largest class action settlement in the Eastern District of Virginia.

Nick was also a key contributor to the Firm's recent success in *MF Global*, in connection with the company's dramatic collapse on October 31, 2011. The plaintiffs secured several settlements totaling more than \$234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Prior to joining the Firm, Nick worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted securities claims *In re Broadcom Corp. Securities Litigation* (\$173.5 million settlement) and *In re NovaGold Resources Inc. Securities Litigation* (\$26.6 million settlement).

Nick earned a B.A., *cum laude*, from the University of Florida and a J.D. from the University of Florida, Levin College of Law (2004). He is admitted to practice in New York (2006) and the U.S. District Courts for the Southern and Eastern Districts of New York (2021).

JOSHUA SAMRA
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Joshua Samra is an associate in the Firm's Antitrust and Consumer practice group. Josh currently plays a significant role in the *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*.

Prior to joining BFA, Josh was a Deputy District Attorney in Contra Costa County. As a Deputy District Attorney, Josh oversaw all parts of criminal prosecutions, including



filing complaints, preparing and arguing motions, interviewing witnesses, trying cases before a jury, and litigating post-trial appeals. During his time in the District Attorney's office, Josh prosecuted ten jury trials to verdict.

Josh earned his B.A. from the University of California Berkeley (2013) and his J.D. from the University of California Los Angeles (2016), where he served as an Associate Editor for the UCLA Law Review. Josh is admitted to practice in California (2016).

MATHEW HOUGH
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Mathew Hough's practice focuses on securities litigation, corporate governance, and shareholder rights litigation. Mathew is skilled in all aspects of litigation, including investigating potential securities fraud claims, briefing dispositive motions, coordinating discovery efforts, and working with expert witnesses.

Matt is currently a member of the team prosecuting the securities class action against Teva Pharmaceutical Industries, Ltd.

Prior to joining the Firm, Mathew was an associate at a prominent plaintiffs' securities class action law firm, where he counseled institutional investors on potential legal claims as part of a team of attorneys, financial analysts, and investigators. Mathew was also previously an associate at Sullivan & Cromwell LLP where he worked extensively on complex commercial litigation, securities litigation, enforcement, and internal investigations.

Mathew earned a B.A. from Washington State University in 2012, and a J.D., *magna cum laude*, from Boston University School of Law in 2017. Mathew is admitted to practice in New York (2018).

FREDERICK WILLIAM GREEN
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Frederick William Green joined the firm in 2014 and is currently an Associate who assists with a number of the firm's securities litigation cases.

Will previously contributed to the Firm's discovery efforts in *In re Genworth Financial Inc. Securities Litigation*, managing the staff attorney discovery team from inception to settlement. The case alleged that Genworth, the largest seller of long-term care insurance in the U.S., misled investors about the true state of its deteriorating long-term care business. On May 1, 2015, U.S. District Judge James R. Spencer denied



defendants' motion to dismiss. The parties reached a settlement of \$219 million, establishing a record for securities litigations in the Eastern District of Virginia.

Will also contributed to the Firm's discovery efforts in the securities litigation against Weatherford International Ltd. on behalf of the Anchorage Police & Fire Retirement System (*Freedman v. Weatherford International Ltd., et al.*). The case alleged that Weatherford, which made three restatements of audited financials totaling approximately \$1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, plaintiffs reached an outstanding recovery of \$120 million on behalf of shareholders.

Will received a B.A. from Union College (2009) and a J.D. from Washington University in St. Louis (2013). Will is admitted to practice in New York (2015) and Massachusetts (2013).

FRANKLYN WILLIAMS
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Franklyn Williams brings nearly a decade of legal experience to his role as a Senior Projects Attorney. As a Senior Projects Attorney, Franklyn is an integral part of the team currently litigating *Ontario Teachers' Pension Plan Board, et al v. Teva Pharmaceutical Industries Ltd. et al*, which alleges that Teva fraudulently misled investors about its U.S. generics business, its financial performance, and its participation in a widespread generic drugs antitrust conspiracy.

Prior to joining BFA, Franklyn served as a Team Leader on a variety of complex litigations. He was also contracted to serve as part of the team at Robbins Geller Rudman & Dowd that litigated *Beaver County Emps' Ret. Fund v. Tile Shop Holdings, Inc.*, resulting in a \$9.5 million recovery.

Franklyn received his J.D. in 2006 from Boston University School of Law where he served as the Editor in Chief of the Boston University International Law Journal and participated in the Civil Litigation Clinic. Franklyn earned his BA in 2003 from Cornell University with a minor in Law & Society and majors in both government and philosophy. While attending Cornell, Franklyn externed with Judge Patricia Anne Williams of the Bronx County Supreme Court and summer interned with both NYC HRA Bureau of Fraud Investigation and NYC ACS Legal Division.

Franklyn is admitted to practice in New York (2008) and New Jersey (2007).


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JANELLE MOODY
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Janelle Moody joined the Firm in 2016 and is currently a Projects Associate in BFA's Oakland office. Janelle brings extensive experience in all phases of litigation to the Firm. She currently plays a significant role in managing discovery in *the In re Inductors Antitrust Litigation* and *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. Her role of providing strategic discovery advice was integral in the negotiation of electronic discovery issues in the *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Litigation*.

Janelle earned her J.D. from Northwestern School of Law at Lewis and Clark College (1997) and is admitted to practice in California (2003) and Oregon (1998).

KATHERINE SULLIVAN
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Katherine Sullivan ('Kasey') joined the Firm in 2016 and is currently a Projects Associate in BFA's Oakland office. Kasey brings nearly two decades of experience to BFA. She currently plays a significant role in managing third party discovery in the *In re Domestic Airlines Travel Antitrust Litigation* and *In re Facebook, Inc. Consumer Privacy User Profile Litigation*.

Kasey earned her J.D. from Northwestern University School of Law (1999), and is admitted to practice in California (2000).

DAVID WAX
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David Wax has significant experience litigating complex matters in New York Federal and State Courts.

David focuses his practice on the discovery phase of complex commercial litigations and has played an integral role supporting the litigation teams in the Firm's securities, antitrust and consumer class action practice groups.

Prior to joining BFA, David was an associate at a large New York law firm where he focused his practice on class actions, insurance and contractual disputes, and complex judicial foreclosures.



David earned his J.D. from Fordham University School of Law (2008) and is admitted to practice in New York (2009) and the Southern and Eastern Districts of New York (2009).

SYLVIA SUM
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Sylvia Sum joined the firm in 2016, and is a staff associate at BFA's Oakland office where she focuses on prosecuting consumer and anti-trust class actions. Sylvia brings over twenty years of experience to BFA. She has played a meaningful role in litigating several matters including *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation* and *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*. In each of these litigations, Sylvia's German language skills have been critical in analyzing the evidence underlying plaintiffs' claims.

Sylvia earned her J.D. from the UC Los Angeles School of Law (1997), and is admitted to practice in California (2000) and Oregon (1997).

GLEN TSURUDOME
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Glen Tsurudome joined BFA's Oakland office in 2019. Glen brings over a decade of experience to his role as staff associate, where he focuses on prosecuting consumer and antitrust class actions. Glen is a key member of the team litigating the *In re Inductors Antitrust Litigation* where his Japanese language skills have played a critical role in investigating plaintiffs' claims.

Glen received a B.A. (2005) from the UC San Diego and a J.D. from the University of San Francisco School of Law (2005). Glen has also completed the Yamasa Institute Academic Intensive Japanese Program (2012). Glen is admitted to practice in California (2005).

CHRISTOHER CAPUOZZO
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Christopher Capuozzo is BFA's Director of Client Data and Claims. He joined BFA in January 2017 with more than twelve years of experience in the securities class action



and claims filing fields. As Director of the Firm's Data Analysis team, Chris contributes to BFA's Global Investment Monitoring Program and analyzes clients' loss exposure to financial fraud across the global marketplace. He also is a member of the Firm's Claims Filing team and is instrumental in the preparation of claim documents on behalf of eligible clients. His financial analysis assists in the identification and evaluation of potential opportunities for the Firm's clients to serve as lead plaintiff, participate in direct actions, join actions outside the United States, and recover from settled matters.

Prior to joining BFA, Chris was a Data Analytics Manager at a securities litigation firm, where he managed a team of analysts providing portfolio monitoring services to the Firm's client base, and was also a Research Analyst at the Goal Group of Companies, a global leader in class action recovery services. Chris began his career at a prominent claims administrator. During his time there, he processed electronically filed claims from leading financial institutions, and advised the company's software developers about what fields to include and how to structure their secure claim filing website for institutional investors.

VICTORIA TSE
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Victoria Tse joined BFA in 2020 as a Senior Data Analyst. Victoria monitors client portfolios to identify and evaluate investment losses, exposure to financial fraud, and potential opportunities for BFA clients to serve as lead plaintiff, participate in direct actions, join class action litigations in non-U.S. jurisdictions, and recover from class action settlements. In assessing client exposure, she evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations. Victoria also helps oversee the acquisition of client investment data from custodians on a monthly basis, as well as maintains clients' accounts by performing annual reviews.

Prior to joining the Firm, Victoria was a senior data analyst at a securities litigation firm.

Elaine Rivera
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Elaine Rivera monitors and analyzes client exposure to financial fraud and evaluates investment losses and potential opportunities for clients to serve as lead plaintiff. In assessing client exposure, she evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations.



Elaine also assists with determining client eligibility to participate in class action settlements and submitting the necessary claim documents on behalf of eligible clients.

Prior to joining BFA, Elaine was a Data Analyst at a securities litigation firm.

Elaine received a Bachelor of Arts from Baruch College.

Jeffrey Esperance <i>Data Analyst</i>	New York	<ul style="list-style-type: none"> • Email: jesperance@bfalaw.com • Tel: +1 212 789 2306 • www.bfalaw.com/professionals/jeffrey-esperance
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Jeffrey Esperance monitors and analyzes client exposure to financial fraud and evaluates investment losses and potential opportunities for clients to serve as lead plaintiff. In assessing client exposure, he evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations.

Jeffrey also assists with determining client eligibility to participate in international securities cases and in class action settlements.

Prior to joining BFA, Jeffrey was a Data Analyst at a securities litigation firm.

Jeffrey received a Bachelor of Arts from Baruch College.

Umang Narayan Suhalka <i>Data Analyst</i>	New York	<ul style="list-style-type: none"> • Email: usuhalika@bfalaw.com • Tel: +1 212 789 3605 • www.bfalaw.com/professionals/Umang-Suhalka
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Umang Narayan Suhalka is a Data Analyst at BFA, where he maintains BFA's proprietary database, monitors and analyzes client exposure to financial fraud, and evaluates investment losses and potential opportunities for clients to serve as lead plaintiff. In assessing client exposure, he evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations.

Umang also assists with determining client eligibility to participate in international securities cases and in class action settlements.

Prior to joining BFA, Umang interned at a financial services firm.



Umang received a Bachelor of Engineering in Computer Science from the University of Pune and a Masters of Science in Information Technology from New York University.

For more information, please visit:
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